

# Application for a §1915(c) Home and Community-Based Services Waiver

## PURPOSE OF THE HCBS WAIVER PROGRAM

The Medicaid Home and Community-Based Services (HCBS) waiver program is authorized in section 1915(c) of the Social Security Act. The program permits a state to furnish an array of home and community-based services that assist Medicaid beneficiaries to live in the community and avoid institutionalization. The state has broad discretion to design its waiver program to address the needs of the waiver's target population. Waiver services complement and/or supplement the services that are available to participants through the Medicaid state plan and other federal, state and local public programs as well as the supports that families and communities provide.

The Centers for Medicare & Medicaid Services (CMS) recognizes that the design and operational features of a waiver program will vary depending on the specific needs of the target population, the resources available to the state, service delivery system structure, state goals and objectives, and other factors. A state has the latitude to design a waiver program that is cost-effective and employs a variety of service delivery approaches, including participant direction of services.

## Request for an Amendment to a §1915(c) Home and Community-Based Services Waiver

### 1. Request Information

**A. The State of Iowa** requests approval for an amendment to the following Medicaid home and community-based services waiver approved under authority of §1915(c) of the Social Security Act.

**B. Program Title:**

**Home and Community Based Services - AIDS/HIV**

**C. Waiver Number:** IA.0213

**Original Base Waiver Number:** IA.0213.

**D. Amendment Number:**

**E. Proposed Effective Date:** (mm/dd/yy)

01/01/26

**Approved Effective Date of Waiver being Amended:** 07/01/25

### 2. Purpose(s) of Amendment

**Purpose(s) of the Amendment.** Describe the purpose(s) of the amendment:

The state is submitting a technical amendment to:

1. Updating the tool used for level of care determinations from Case Management Comprehensive Assessment to the interRAI-Early Years for 0-3 year olds
2. Add Core Standardized Assessment contractor to contracted entities in Appendix A
3. Removed the individual Consumer Directed Attendant Care (CDAC) provider type, renamed the service to Attendant Care
4. Align service definitions, scope, and limitations for alike services across waivers
5. Allow members to choose whether they work with an ISBs (Individual Support Brokers), making it optional rather than mandatory for members who self-direct their services.
6. Update the term Exception to Policy (ETP) to Waiver of Iowa Administrative Rules (WoAR)
7. Update QI section for Appendix D to remove reference to CAHPS on measures that do not utilize the survey.
8. Remove references to Integrated Health Home (IHH) and IHH Coordinators due to SPA sunseting 12/31/2025
9. Add the requirement that individuals with an intellectual disability or a developmental disability have face to face contact with the case manager at least every other month.

### 3. Nature of the Amendment

**A. Component(s) of the Approved Waiver Affected by the Amendment.** This amendment affects the following component(s) of the approved waiver. Revisions to the affected subsection(s) of these component(s) are being submitted concurrently (*check each that applies*):

Component of the Approved Waiver	Subsection(s)
<input checked="" type="checkbox"/> Waiver Application	Main 2, 6, 7, 8
<input checked="" type="checkbox"/> Appendix A - Waiver Administration and Operation	3
<input checked="" type="checkbox"/> Appendix B - Participant Access and Eligibility	3, 6
<input checked="" type="checkbox"/> Appendix C - Participant Services	1, 2
<input checked="" type="checkbox"/> Appendix D - Participant Centered Service Planning and Delivery	1, 2
<input checked="" type="checkbox"/> Appendix E - Participant Direction of Services	1, 2
<input checked="" type="checkbox"/> Appendix F - Participant Rights	1
<input checked="" type="checkbox"/> Appendix G - Participant Safeguards	1
<input type="checkbox"/> Appendix H	
<input checked="" type="checkbox"/> Appendix I - Financial Accountability	1, 2, 3
<input checked="" type="checkbox"/> Appendix J - Cost-Neutrality Demonstration	2

**B. Nature of the Amendment.** Indicate the nature of the changes to the waiver that are proposed in the amendment (*check each that applies*):

- ☐ Modify target group(s)
- ☐ Modify Medicaid eligibility
- ☐ Add/delete services
- ☒ Revise service specifications
- ☒ Revise provider qualifications
- ☐ Increase/decrease number of participants
- ☒ Revise cost neutrality demonstration
- ☐ Add participant-direction of services
- ☐ Other

Specify:

## Application for a §1915(c) Home and Community-Based Services Waiver

### 1. Request Information (1 of 3)

**A. The State of Iowa** requests approval for a Medicaid home and community-based services (HCBS) waiver under the authority of section 1915(c) of the Social Security Act (the Act).

**B. Program Title** (optional - this title will be used to locate this waiver in the finder):

Home and Community Based Services - AIDS/HIV

**C. Type of Request:** amendment

**Requested Approval Period:** (For new waivers requesting five year approval periods, the waiver must serve individuals who are dually eligible for Medicaid and Medicare.)

☐ 3 years ☒ 5 years

**Original Base Waiver Number:** IA.0213

**Draft ID:** IA.015.07.01

**D. Type of Waiver** (select only one):

Regular Waiver

**E. Proposed Effective Date of Waiver being Amended:** 07/01/25

**Approved Effective Date of Waiver being Amended:** 07/01/25

### PRA Disclosure Statement

The purpose of this application is for states to request a Medicaid Section 1915(c) home and community-based services (HCBS) waiver. Section 1915(c) of the Social Security Act authorizes the Secretary of Health and Human Services to waive certain specific Medicaid statutory requirements so that a state may voluntarily offer HCBS to state-specified target group(s) of Medicaid beneficiaries who need a level of institutional care that is provided under the Medicaid state plan. Under the Privacy Act of 1974 any personally identifying information obtained will be kept private to the extent of the law.

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0938-0449 (Expires: July 31, 2027). The time required to complete this information collection is estimated to average 163 hours per response for a new waiver application and 78 hours per response for a renewal application, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: CMS, 7500 Security Boulevard, Attn: PRA Reports Clearance Officer, Mail Stop C4-26-05, Baltimore, Maryland 21244-1850.

### 1. Request Information (2 of 3)

**F. Level(s) of Care.** This waiver is requested in order to provide home and community-based waiver services to individuals who, but for the provision of such services, would require the following level(s) of care, the costs of which would be reimbursed under the approved Medicaid state plan (check each that applies):

☒ **Hospital**

Select applicable level of care

☒ **Hospital as defined in 42 CFR § 440.10**

If applicable, specify whether the state additionally limits the waiver to subcategories of the hospital level of care:

☐ **Inpatient psychiatric facility for individuals age 21 and under as provided in 42 CFR § 440.160**

☒ **Nursing Facility**

Select applicable level of care

☒ **Nursing Facility as defined in 42 CFR § 440.40 and 42 CFR § 440.155**

If applicable, specify whether the state additionally limits the waiver to subcategories of the nursing facility level of care:

☐ **Institution for Mental Disease for persons with mental illnesses aged 65 and older as provided in 42 CFR § 440.140**

☐ **Intermediate Care Facility for Individuals with Intellectual Disabilities (ICF/IID) (as defined in 42 CFR § 440.150)**

If applicable, specify whether the state additionally limits the waiver to subcategories of the ICF/IID level of care:

## 1. Request Information (3 of 3)

**G. Concurrent Operation with Other Programs.** This waiver operates concurrently with another program (or programs) approved under the following authorities

Select one:

☐ **Not applicable**

☒ **Applicable**

Check the applicable authority or authorities:

☐ **Services furnished under the provisions of section 1915(a)(1)(a) of the Act and described in Appendix I**

☒ **Waiver(s) authorized under section 1915(b) of the Act.**

Specify the section 1915(b) waiver program and indicate whether a section 1915(b) waiver application has been submitted or previously approved:

1915(b)Iowa High Quality Healthcare Initiative, most recently approved on September 30, 2022.

**Specify the section 1915(b) authorities under which this program operates (check each that applies):**

☒ **section 1915(b)(1) (mandated enrollment to managed care)**

☐ **section 1915(b)(2) (central broker)**

☒ **section 1915(b)(3) (employ cost savings to furnish additional services)**

☒ **section 1915(b)(4) (selective contracting/limit number of providers)**

☐ **A program operated under section 1932(a) of the Act.**

Specify the nature of the state plan benefit and indicate whether the state plan amendment has been submitted or previously approved:

- ☐ A program authorized under section 1915(i) of the Act.
- ☐ A program authorized under section 1915(j) of the Act.
- ☐ A program authorized under section 1115 of the Act.

*Specify the program:*

#### H. Dual Eligibility for Medicaid and Medicare.

Check if applicable:

- ☒ This waiver provides services for individuals who are eligible for both Medicare and Medicaid.

## 2. Brief Waiver Description

**Brief Waiver Description.** *In one page or less*, briefly describe the purpose of the waiver, including its goals, objectives, organizational structure (e.g., the roles of state, local and other entities), and service delivery methods.

The goal of the Iowa HCBS AIDS/HIV waiver is to provide community alternatives to institutional services. Through need-based funding of individualized supports, eligible participants may maintain their position within their home and community rather than default placement within an institutional setting. The Iowa Department of Health and Human Services (HHS) Iowa Medicaid is the single state agency responsible for the oversight of Medicaid.

Individuals access waiver services by applying to their local HHS office or through the online HHS benefits portal. Each individual applying for waiver services must meet nursing facility (as defined in 42 CFR §440.40 and 42 CFR §440.155) level of care. Iowa Medicaid's Medical Services Unit (MSU) is responsible for determining the initial level of care assessments for all applicants, and level of care revaluations.

Further, the MCOs are responsible for developing and implementing policies and procedures for ongoing identification of members who may be eligible for waiver services. In the event there is a waiting list for waiver services at the time of initial assessment, applicants are advised of the waiting list and that they may choose to receive facility-based services.

If the applicant is deemed eligible, necessary services are determined through a person-centered planning process with assistance from an interdisciplinary team. After exploring all available resources, including natural and community supports, the individual will have the option to choose between various traditional and self-directed services.

Services include Adult Day Care, Home Maintenance Support, Respite, Home Health Aide, Nursing, Attendant Care, Counseling, Home Delivered Meals, and self-directed services. Self-directed services include financial management services, independent support broker, self-directed personal care, self-directed community and employment support, and individual directed goods and services.

Through increased legislative focus of appropriations, mental health and disability services redesign, and infrastructure development through Iowa's Balancing Incentives Payment Program, it is the goal of Iowa to offer a more uniform and equitable system of community support delivery to individuals qualifying for waiver services.

## 3. Components of the Waiver Request

The waiver application consists of the following components. *Note: Item 3-E must be completed.*

**A. Waiver Administration and Operation.** Appendix A specifies the administrative and operational structure of this waiver.

**B. Participant Access and Eligibility.** Appendix B specifies the target group(s) of individuals who are served in this waiver, the number of participants that the state expects to serve during each year that the waiver is in effect, applicable Medicaid eligibility and post-eligibility (if applicable) requirements, and procedures for the evaluation and reevaluation of level of care.

**C. Participant Services.** Appendix C specifies the home and community-based waiver services that are furnished through the waiver, including applicable limitations on such services.

**D. Participant-Centered Service Planning and Delivery.** Appendix D specifies the procedures and methods that the state uses to develop, implement and monitor the participant-centered service plan (of care).

**E. Participant-Direction of Services.** When the state provides for participant direction of services, Appendix E specifies the participant direction opportunities that are offered in the waiver and the supports that are available to participants who direct their services. (*Select one*):

- ☒ **Yes. This waiver provides participant direction opportunities.** Appendix E is required.
- ☐ **No. This waiver does not provide participant direction opportunities.** Appendix E is not required.

**F. Participant Rights.** Appendix F specifies how the state informs participants of their Medicaid Fair Hearing rights and other procedures to address participant grievances and complaints.

**G. Participant Safeguards.** Appendix G describes the safeguards that the state has established to assure the health and welfare of waiver participants in specified areas.

**H. Quality Improvement Strategy.** Appendix H contains the quality improvement strategy for this waiver.

**I. Financial Accountability.** Appendix I describes the methods by which the state makes payments for waiver services, ensures the integrity of these payments, and complies with applicable federal requirements concerning payments and federal financial participation.

**J. Cost-Neutrality Demonstration.** Appendix J contains the state's demonstration that the waiver is cost-neutral.

#### 4. Waiver(s) Requested

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**A. Comparability.** The state requests a waiver of the requirements contained in section 1902(a)(10)(B) of the Act in order to provide the services specified in Appendix C that are not otherwise available under the approved Medicaid state plan to individuals who: (a) require the level(s) of care specified in Item 1.F and (b) meet the target group criteria specified in Appendix B.

**B. Income and Resources for the Medically Needy.** Indicate whether the state requests a waiver of section 1902(a)(10)(C)(i)(III) of the Act in order to use institutional income and resource rules for the medically needy (*select one*):

- ☒ **Not Applicable**
- ☐ **No**
- ☐ **Yes**

**C. Statewide.** Indicate whether the state requests a waiver of the statewide requirements in section 1902(a)(1) of the Act (*select one*):

- ☒ **No**
- ☐ **Yes**

If yes, specify the waiver of statewide requirements that is requested (*check each that applies*):

- ☐ **Geographic Limitation.** A waiver of statewide requirements is requested in order to furnish services under this waiver only to individuals who reside in the following geographic areas or political subdivisions of the state. Specify the areas to which this waiver applies and, as applicable, the phase-in schedule of the waiver by geographic area:

- ☐ **Limited Implementation of Participant-Direction.** A waiver of statewide requirements is requested in order to make participant-direction of services as specified in Appendix E available only to individuals who reside in the following geographic areas or political subdivisions of the state. Participants who reside in these areas may elect to direct their services as provided by the state or receive comparable services through the service delivery methods that are in effect elsewhere in the state.

*Specify the areas of the state affected by this waiver and, as applicable, the phase-in schedule of the waiver by geographic area:*

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## 5. Assurances

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In accordance with 42 CFR § 441.302, the state provides the following assurances to CMS:

- A. Health & Welfare:** The state assures that necessary safeguards have been taken to protect the health and welfare of persons receiving services under this waiver. These safeguards include:
1. As specified in **Appendix C**, adequate standards for all types of providers that provide services under this waiver;
  2. Assurance that the standards of any state licensure or certification requirements specified in **Appendix C** are met for services or for individuals furnishing services that are provided under the waiver. The state assures that these requirements are met on the date that the services are furnished; and,
  3. Assurance that all facilities subject to section 1616(e) of the Act where home and community-based waiver services are provided comply with the applicable state standards for board and care facilities as specified in **Appendix C**.
- B. Financial Accountability.** The state assures financial accountability for funds expended for home and community-based services and maintains and makes available to the Department of Health and Human Services (including the Office of the Inspector General), the Comptroller General, or other designees, appropriate financial records documenting the cost of services provided under the waiver. Methods of financial accountability are specified in **Appendix I**.
- C. Evaluation of Need:** The state assures that it provides for an initial evaluation (and periodic reevaluations, at least annually) of the need for a level of care specified for this waiver, when there is a reasonable indication that an individual might need such services in the near future (one month or less) but for the receipt of home and community-based services under this waiver. The procedures for evaluation and reevaluation of level of care are specified in **Appendix B**.
- D. Choice of Alternatives:** The state assures that when an individual is determined to be likely to require the level of care specified for this waiver and is in a target group specified in **Appendix B**, the individual (or, legal representative, if applicable) is:
1. Informed of any feasible alternatives under the waiver; and,
  2. Given the choice of either institutional or home and community-based waiver services. **Appendix B** specifies the procedures that the state employs to ensure that individuals are informed of feasible alternatives under the waiver and given the choice of institutional or home and community-based waiver services.
- E. Average Per Capita Expenditures:** The state assures that, for any year that the waiver is in effect, the average per capita expenditures under the waiver will not exceed 100 percent of the average per capita expenditures that would have been made under the Medicaid state plan for the level(s) of care specified for this waiver had the waiver not been granted. Cost-neutrality is demonstrated in **Appendix J**.
- F. Actual Total Expenditures:** The state assures that the actual total expenditures for home and community-based waiver and other Medicaid services and its claim for FFP in expenditures for the services provided to individuals under the waiver will not, in any year of the waiver period, exceed 100 percent of the amount that would be incurred in the absence of the waiver by the state's Medicaid program for these individuals in the institutional setting(s) specified for this waiver.
- G. Institutionalization Absent Waiver:** The state assures that, absent the waiver, individuals served in the waiver would receive the appropriate type of Medicaid-funded institutional care for the level of care specified for this waiver.
- H. Reporting:** The state assures that annually it will provide CMS with information concerning the impact of the waiver on the type, amount and cost of services provided under the Medicaid state plan and on the health and welfare of waiver participants. This information will be consistent with a data collection plan designed by CMS.

**I. Habilitation Services.** The state assures that prevocational, educational, or supported employment services, or a combination of these services, if provided as habilitation services under the waiver are: (1) not otherwise available to the individual through a local educational agency under the Individuals with Disabilities Education Act (IDEA) or the Rehabilitation Act of 1973; and, (2) furnished as part of expanded habilitation services.

**J. Services for Individuals with Chronic Mental Illness.** The state assures that federal financial participation (FFP) will not be claimed in expenditures for waiver services including, but not limited to, day treatment or partial hospitalization, psychosocial rehabilitation services, and clinic services provided as home and community-based services to individuals with chronic mental illnesses if these individuals, in the absence of a waiver, would be placed in an IMD and are: (1) age 22 to 64; (2) age 65 and older and the state has not included the optional Medicaid benefit cited in 42 CFR § 440.140; or (3) age 21 and under and the state has not included the optional Medicaid benefit cited in 42 CFR § 440.160.

## 6. Additional Requirements

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*Note: Item 6-I must be completed.*

**A. Service Plan.** In accordance with 42 CFR § 441.301(b)(1)(i), a participant-centered service plan (of care) is developed for each participant employing the procedures specified in **Appendix D**. All waiver services are furnished pursuant to the service plan. The service plan describes: (a) the waiver services that are furnished to the participant, their projected frequency and the type of provider that furnishes each service and (b) the other services (regardless of funding source, including state plan services) and informal supports that complement waiver services in meeting the needs of the participant. The service plan is subject to the approval of the Medicaid agency. Federal financial participation (FFP) is not claimed for waiver services furnished prior to the development of the service plan or for services that are not included in the service plan.

**B. Inpatients.** In accordance with 42 CFR § 441.301(b)(1)(ii), waiver services are not furnished to individuals who are inpatients of a hospital, nursing facility or ICF/IID.

**C. Room and Board.** In accordance with 42 CFR § 441.310(a)(2), FFP is not claimed for the cost of room and board except when: (a) provided as part of respite services in a facility approved by the state that is not a private residence or (b) claimed as a portion of the rent and food that may be reasonably attributed to an unrelated caregiver who resides in the same household as the participant, as provided in **Appendix I**.

**D. Access to Services.** The state does not limit or restrict participant access to waiver services except as provided in **Appendix C**.

**E. Free Choice of Provider.** In accordance with 42 CFR § 431.151, a participant may select any willing and qualified provider to furnish waiver services included in the service plan unless the state has received approval to limit the number of providers under the provisions of section 1915(b) or another provision of the Act.

**F. FFP Limitation.** In accordance with 42 CFR Part 433 Subpart D, FFP is not claimed for services when another third-party (e.g., another third party health insurer or other federal or state program) is legally liable and responsible for the provision and payment of the service. If a provider certifies that a particular legally liable third-party insurer does not pay for the service(s), the provider may not generate further bills for that insurer for that annual period.

**G. Fair Hearing:** The state provides the opportunity to request a Fair Hearing under 42 CFR Part 431 Subpart E, to individuals: (a) who are not given the choice of home and community-based waiver services as an alternative to institutional level of care specified for this waiver; (b) who are denied the service(s) of their choice or the provider(s) of their choice; or (c) whose services are denied, suspended, reduced or terminated. **Appendix F** specifies the state's procedures to provide individuals the opportunity to request a Fair Hearing, including providing notice of action as required in 42 CFR § 431.210.

**H. Quality Improvement.** The state operates a formal, comprehensive system to ensure that the waiver meets the assurances and other requirements contained in this application. Through an ongoing process of discovery, remediation and improvement, the state assures the health and welfare of participants by monitoring: (a) level of care determinations; (b) individual plans and services delivery; (c) provider qualifications; (d) participant health and welfare; (e) financial oversight and (f) administrative oversight of the waiver. The state further assures that all problems identified through its discovery processes are addressed in an appropriate and timely manner, consistent with the severity and nature of the problem. During the period that the waiver is in effect, the state will implement the quality improvement strategy specified in **Appendix H**.



**I. Public Input.** Describe how the state secures public input into the development of the waiver:

HHS seeks continuous and ongoing public input through a variety of modalities, including townhalls, listening sessions, committees, and workgroups. Iowa Medicaid also participates and collaborates with a number of provider and member association and advocacy groups. Regular input into the operation and implementation of the waiver is obtained from Iowa Association of Community Providers, Iowa Coalition for Integration and Employment, Developmental Disabilities Council, Mental Health, and Disability Service (MHDS) Regions, Child Health Specialty Clinics, Iowa State Association of Counties, Iowa Health Care Association, and Olmstead Task Force.

The public has the opportunity to comment on Iowa Administrative rules and rule changes through the public comment process, the Legislative Rules Committee, and the HHS Council. Iowa Medicaid also provides notice of applications and amendments by including notice in the Iowa Medicaid e-News emails and on the Iowa Medicaid website.

Iowa Medicaid used the following processes to secure public input into the development of the Aids/HIV Renewal:

- 1) Iowa Medicaid Website Posting: <https://hhs.iowa.gov/public-notice/XXXXXXX>
- 2) HHS Field Office Posting – Iowa Medicaid provides notification to the HHS Field Office, which in turn, notifies each HHS Field Office to post the Aids/HIV Waiver Public Notice and to provide a copy of the CMS Waiver Application for any public request.
- 3) Iowa Medicaid Public Notice Subscribers - Medicaid members, Medicaid providers, legislators, advocacy organizations and others who wish to remain informed regarding Iowa Medicaid can subscribe to the Iowa Medicaid Public Notice webpage. All subscribers will receive electronic notice whenever an update/public notice is posted. This process includes HCBS waiver applications and amendments. The public posting period was the same for this process. The public notice period began on August XX, 2025 and closed on September XX, 2025. There were no public comments received during the notice period.
- 4) Iowa Tribal Nations Notification -The Tribal Nations were notified of the intent to amend the waiver via email January 28, 2025, and an online consultation call was held on August XX, 2025. The comment period remained open through September XX, 2025. The Tribal liaison for the department received no tribal comments during the notice period.

**J. Notice to Tribal Governments.** The state assures that it has notified in writing all federally-recognized Tribal Governments that maintain a primary office and/or majority population within the state of the state's intent to submit a Medicaid waiver request or renewal request to CMS at least 60 days before the anticipated submission date is provided by Presidential Executive Order 13175 of November 6, 2000. Evidence of the applicable notice is available through the Medicaid Agency.

**K. Limited English Proficient Persons.** The state assures that it provides meaningful access to waiver services by Limited English Proficient persons in accordance with: (a) Presidential Executive Order 13166 of August 11, 2000 (65 FR 50121) and (b) Department of Health and Human Services "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (68 FR 47311 - August 8, 2003). **Appendix B** describes how the state assures meaningful access to waiver services by Limited English Proficient persons.

## 7. Contact Person(s)

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**A.** The Medicaid agency representative with whom CMS should communicate regarding the waiver is:

**Last Name:**

Casey

**First Name:**

Christy

**Title:**

Program Manager

**Agency:**

Iowa Department of Health and Human Services/Iowa Medicaid

**Address:**

321 E 12th St.

**Address 2:****City:**

Des Moines

**State:**

Iowa

**Zip:**

50319

**Phone:**

(515) 630-9649

Ext:



TTY

**Fax:**

(515) 725-1360

**E-mail:**

christy.casey@hhs.iowa.gov

**B.** If applicable, the state operating agency representative with whom CMS should communicate regarding the waiver is:

**Last Name:**

Steenblock

**First Name:**

Jennifer

**Title:**

Federal Compliance Officer

**Agency:**

Iowa Department of Health and Human Services/Iowa Medicaid

**Address:**

321 E 12th St.

**Address 2:****City:**

Des Moines

**State:**

Iowa

**Zip:**

50319

**Phone:**

(515) 256-4636

Ext:



TTY

**Fax:**

E-mail:

## 8. Authorizing Signature

This document, together with the attached revisions to the affected components of the waiver, constitutes the state's request to amend its approved waiver under section 1915(c) of the Social Security Act. The state affirms that it will abide by all provisions of the waiver, including the provisions of this amendment when approved by CMS. The state further attests that it will continuously operate the waiver in accordance with the assurances specified in Section V and the additional requirements specified in Section VI of the approved waiver. The state certifies that additional proposed revisions to the waiver request will be submitted by the Medicaid agency in the form of additional waiver amendments.

Signature:

State Medicaid Director or Designee

Submission Date:

**Note: The Signature and Submission Date fields will be automatically completed when the State Medicaid Director submits the application.**

Last Name:

First Name:

Title:

Agency:

Address:

Address 2:

City:

State:

Zip:

Phone:

Ext:  ☐ TTY

Fax:

E-mail:

Attachments

**Attachment #1: Transition Plan**

Check the box next to any of the following changes from the current approved waiver. Check all boxes that apply.

- ☐ Replacing an approved waiver with this waiver.
- ☐ Combining waivers.
- ☐ Splitting one waiver into two waivers.
- ☐ Eliminating a service.
- ☐ Adding or decreasing an individual cost limit pertaining to eligibility.
- ☐ Adding or decreasing limits to a service or a set of services, as specified in Appendix C.
- ☐ Reducing the unduplicated count of participants (Factor C).
- ☐ Adding new, or decreasing, a limitation on the number of participants served at any point in time.
- ☐ Making any changes that could result in some participants losing eligibility or being transferred to another waiver under 1915(c) or another Medicaid authority.
- ☐ Making any changes that could result in reduced services to participants.

Specify the transition plan for the waiver:

**Additional Needed Information (Optional)**

Provide additional needed information for the waiver (optional):

Due to the character limitations in the application SP-c1, and SP-e1 are listed below.

SP-c1: Number and percent of CAHPS respondents who responded “YES” on the CAHPS survey to question 53 “In the last 3 months, did this {case manager} work with you when you asked for help with getting other changes to your services?”.

Numerator: Number of CAHPS respondents who responded “YES” on the CAHPS survey to question 53 “In the last 3 months, did this {case manager} work with you when you asked for help with getting other changes to your services?”.

Denominator: Total number of CAHPS respondents who were directed to question number 53 due to responding “YES” on the CAHPS survey to question 52 “In the last 3 months, did you ask this {case manager} for help in getting any changes to your services, such as more help from {personal assistance/behavioral health staff and/or homemakers if applicable}, or for help with getting places or finding a job?”.

SP-e1: Number and percent of CAHPS respondents who responded with either “MOST” or “ALL” on the CAHPS survey to question 56 “In the last 3 months, did your service plan include . . . of the things that are important to you”.

Numerator: Number of CAHPS respondents who responded with either “MOST” or “ALL” on the CAHPS survey to question 56 “In the last 3 months, did your service plan include . . . of the things that are important to you”.

Denominator: Total number of CAHPS respondents who responded to the CAHPS survey to question 56 “In the last 3 months, did your service plan include . . . of the things that are important to you”.

**Appendix A: Waiver Administration and Operation**

**1. State Line of Authority for Waiver Operation.** Specify the state line of authority for the operation of the waiver (*select one*):

☒ **The waiver is operated by the state Medicaid agency.**

Specify the Medicaid agency division/unit that has line authority for the operation of the waiver program (*select one*):

☒ **The Medical Assistance Unit.**

Specify the unit name:

Iowa Medicaid, Bureau of Long-Term Services and Supports

(Do not complete item A-2)

☐ **Another division/unit within the state Medicaid agency that is separate from the Medical Assistance Unit.**

Specify the division/unit name. This includes administrations/divisions under the umbrella agency that has been identified as the Single State Medicaid Agency.

(Complete item A-2-a).

☐ **The waiver is operated by a separate agency of the state that is not a division/unit of the Medicaid agency.**

Specify the division/unit name:

In accordance with 42 CFR § 431.10, the Medicaid agency exercises administrative discretion in the administration and supervision of the waiver and issues policies, rules and regulations related to the waiver. The interagency agreement or memorandum of understanding that sets forth the authority and arrangements for this policy is available through the Medicaid agency to CMS upon request. (Complete item A-2-b).

## Appendix A: Waiver Administration and Operation

### 2. Oversight of Performance.

**a. Medicaid Director Oversight of Performance When the Waiver is Operated by another Division/Unit within the State Medicaid Agency.** When the waiver is operated by another division/administration within the umbrella agency designated as the Single State Medicaid Agency. Specify (a) the functions performed by that division/administration (i.e., the Developmental Disabilities Administration within the Single State Medicaid Agency), (b) the document utilized to outline the roles and responsibilities related to waiver operation, and (c) the methods that are employed by the designated State Medicaid Director (in some instances, the head of umbrella agency) in the oversight of these activities:

**As indicated in section 1 of this appendix, the waiver is not operated by another division/unit within the state Medicaid agency. Thus this section does not need to be completed.**

**b. Medicaid Agency Oversight of Operating Agency Performance.** When the waiver is not operated by the Medicaid agency, specify the functions that are expressly delegated through a memorandum of understanding (MOU) or other written document, and indicate the frequency of review and update for that document. Specify the methods that the Medicaid agency uses to ensure that the operating agency performs its assigned waiver operational and administrative functions in accordance with waiver requirements. Also specify the frequency of Medicaid agency assessment of operating agency performance:

**As indicated in section 1 of this appendix, the waiver is not operated by a separate agency of the state. Thus, this section does not need to be completed.**

## Appendix A: Waiver Administration and Operation

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**3. Use of Contracted Entities.** Specify whether contracted entities perform waiver operational and administrative functions on behalf of the Medicaid agency and/or the operating agency (if applicable) (*select one*):

- ☒ **Yes. Contracted entities perform waiver operational and administrative functions on behalf of the Medicaid agency and/or operating agency (if applicable).**

Specify the types of contracted entities and briefly describe the functions that they perform. *Complete Items A-5 and A-6.:*

**MCO -**

MCOs will generally be responsible for delivering covered benefits, including physical health, behavioral health and LTSS in a highly coordinated manner. Specific functions include, but are not limited to, the following:

- Developing policies and procedures for ongoing identification of members who may be eligible for waiver services.
- Developing service plans, coordinating care, and authorizing and initiating waiver services for all members.
- Delivering community-based case management services and monitoring receipt of services.
- Contracting with an entity or entities for financial management services to assist members who elect self-direction (i.e., Iowa's "Consumer Choices Option").
- Maintaining a toll-free telephone hotline for all providers with questions, concerns, or complaints.
- Maintaining a toll-free telephone hotline for all members to address questions, concerns, or complaints.
- Operating a 24/7 toll-free Nurse Call Line which provides nurse triage telephone services for members to receive medical advice from trained medical professionals.
- Creating and distributing member and provider materials (handbooks, directory, forms, policies and procedures, notices, etc.).
- Operating an incident reporting and management system.
- Maintaining a utilization management program.
- Developing programs and participating in activities to enhance the general health and well-being of members; and
- Conducting provider services such as network contracting, credentialing, enrollment and disenrollment, training, and claims processing.

**Core Standardized Assessment (CSA)-** CSA contractor is responsible for conducting assessments to determine level of care evaluations and reevaluations for all applicants and members, using HHS designated tools.

**FFS**

Those members who have not yet enrolled with an MCO, or who are otherwise ineligible for managed care enrollment as defined in the Iowa High Quality Healthcare Initiative §1915(b) waiver, will continue to receive services through the fee-for-service delivery system. As such, the State will continue to contract with the following entities to perform certain waiver functions:

Core Standardized Assessment contractor conducts level of care assessments.

Member Services contractor disseminates information to Medicaid beneficiaries and provides support. Additionally, Member Services provides clinical review to identify beneficiary population risks such that additional education, program support, and policy revision can mitigate risks to the beneficiary when possible.

Medical Services Unit contractor, part of the Quality Improvement Organization (QIO), determine level of care eligibility and service plan development ad-hoc reviews to ensure that waiver requirements are met. In addition, MSU conducts the necessary activities associated with prior authorization of waiver services, authorization of service plan changes and medical necessity reviews associated with Program Integrity and Provider Cost Audit activities.

HCBS Quality Improvement Organization (QIO) contractor reviews provider compliance with State and federal requirements, monitors complaints, monitors critical incident reports and technical assistance to ensure that quality services are provided to all Medicaid members.

Program Integrity and Recovery Audit Coordinator contractor reviews provider records and claims for instances of Medicaid fraud, waste, and abuse. These components are evaluated and analyzed at an individual and system level through fraud hotline referrals and algorithm development.

Provider Services contractor coordinates provider recruitment and executes the Medicaid Provider Agreement. The Provider Services Unit conducts provider background checks as required, conducts annual provider trainings, supervises the provider assistance call center, and manages the help functions associated with Iowa Medicaid's Institutional and Waiver Authorization and Narrative System (IoWANS)

Provider Cost Audit contractor determines service rates and payment amounts. The Provider Cost Audit Unit

performs financial reviews of projected rates, reconciled cost reports, and performs onsite fiscal reviews of targeted provider groups.

Revenue Collections Unit contractor performs recovery of identified overpayments related to program integrity efforts, cost report reconciliations, third-party liability, and trusts.

Pharmacy contractor oversees the operation of the Preferred Drug List (PDL) and Prior Authorization (PA) for prescription drugs. The development and updating of the PDL allows the Medicaid program to optimize the funds spent for prescription drugs. The Pharmacy Medical group performs drug Prior Authorization with medical professionals who evaluate each request for the use of a number of drugs.

Point-of-Sale (POS) contractor is the pharmacy point of sale system. It is a real-time system for pharmacies to submit prescription drug claims for Iowa Medicaid beneficiaries and receive a timely determination regarding payment.

All contracted entities including the Medicaid Department conduct training and technical assistance concerning their particular area of expertise concerning waiver requirements. Please note that ultimately it is the Medicaid agency that has overall responsibility for all of the functions while some of the functions are performed by contracting agencies. In regard to training, technical assistance, recruitment and disseminating information, this is done by both the Medicaid agency and contracted agencies throughout regular day-to-day business.

- ☐ **No. Contracted entities do not perform waiver operational and administrative functions on behalf of the Medicaid agency and/or the operating agency (if applicable).**

## Appendix A: Waiver Administration and Operation

**4. Role of Local/Regional Non-State Entities.** Indicate whether local or regional non-state entities perform waiver operational and administrative functions and, if so, specify the type of entity (*Select One*):

- ☒ **Not applicable**
- ☐ **Applicable** - Local/regional non-state agencies perform waiver operational and administrative functions.  
Check each that applies:

- ☐ **Local/Regional non-state public agencies** perform waiver operational and administrative functions at the local or regional level. There is an **interagency agreement or memorandum of understanding** between the state and these agencies that sets forth responsibilities and performance requirements for these agencies that is available through the Medicaid agency.

*Specify the nature of these agencies and complete items A-5 and A-6:*

- ☐ **Local/Regional non-governmental non-state entities** conduct waiver operational and administrative functions at the local or regional level. There is a contract between the Medicaid agency and/or the operating agency (when authorized by the Medicaid agency) and each local/regional non-state entity that sets forth the responsibilities and performance requirements of the local/regional entity. The **contract(s)** under which private entities conduct waiver operational functions are available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

*Specify the nature of these entities and complete items A-5 and A-6:*

## Appendix A: Waiver Administration and Operation



- 5. Responsibility for Assessment of Performance of Contracted and/or Local/Regional Non-State Entities.** Specify the state agency or agencies responsible for assessing the performance of contracted and/or local/regional non-state entities in conducting waiver operational and administrative functions:

The Iowa Department of Health and Human Services, Iowa Medicaid staff are responsible for oversight of the contracted entities. HHS, Iowa Medicaid is the State Agency responsible for conducting the operational and administrative functions of the waiver.

## Appendix A: Waiver Administration and Operation

- 6. Assessment Methods and Frequency.** Describe the methods that are used to assess the performance of contracted and/or local/regional non-state entities to ensure that they perform assigned waiver operational and administrative functions in accordance with waiver requirements. Also specify how frequently the performance of contracted and/or local/regional non-state entities is assessed:

Iowa Medicaid is an endeavor that unites State Staff and "Best of Breed" contractors into a performance-based model for the administration of the Iowa Medicaid program. Iowa Medicaid is a collection of specific units, each having an area of expertise, and all working together to accomplish the goals of the Medicaid program. Iowa Medicaid has contract staff who participates in the following activities: provider services, member services, provider audit and rate setting, processing payments and claims, medical services, pharmacy, program integrity, and revenue collections. All contracts are selected through a competitive request for proposal (RFP) process. Contract RFPs are issued every five years.

All contracted entities are assigned a State-employed contract manager, are assessed through their performance-based contracts, and are required to report on their performance related to scope of work and deliverables. Monthly meetings are designed to facilitate communication among the various business units within Iowa Medicaid to ensure coordination of operations and performance outcomes. In addition, all contracted agencies are required to complete a comprehensive quarterly report on their performance to include programmatic and quality measures designed to measure the contract activities as well as trends identified within Medicaid programs and populations.

The State has established a Managed Care Bureau within Iowa Medicaid to provide comprehensive program oversight and compliance. Specifically, the Bureau Chief, reporting directly to the Medicaid Director, is responsible for directing the activities of bureau staff. Each MCO account manager will oversee contract compliance for one designated MCO. The MCO account managers will serve as liaisons between the MCOs and the State and will be the point of contact coordinating communications and connecting subject matter experts. The new Bureau will work directly with the Iowa Medicaid Program Integrity Unit, which oversees compliance of all Iowa Medicaid providers, including the MCOs.

## Appendix A: Waiver Administration and Operation

- 7. Distribution of Waiver Operational and Administrative Functions.** In the following table, specify the entity or entities that have responsibility for conducting each of the waiver operational and administrative functions listed (*check each that applies*):

In accordance with 42 CFR § 431.10, when the Medicaid agency does not directly conduct a function, it supervises the performance of the function and establishes and/or approves policies that affect the function. All functions not performed directly by the Medicaid agency must be delegated in writing and monitored by the Medicaid Agency. *Note: More than one box may be checked per item. Ensure that Medicaid is checked when the Single State Medicaid Agency (1) conducts the function directly; (2) supervises the delegated function; and/or (3) establishes and/or approves policies related to the function.* Note: Medicaid eligibility determinations can only be performed by the State Medicaid Agency (SMA) or a government agency delegated by the SMA in accordance with 42 CFR § 431.10. Thus, eligibility determinations for the group described in 42 CFR § 435.217 (which includes a level-of-care evaluation, because meeting a 1915(c) level of care is a factor of determining Medicaid eligibility for the group) must comply with 42 CFR § 431.10. Non-governmental entities can support administrative functions of the eligibility determination process that do not require discretion including, for example, data entry functions, IT support, and implementation of a standardized level-of-care evaluation tool. States should ensure that any use of an evaluation tool by a non-governmental entity to evaluate/determine an individual's required level-of-care involves no discretion by the non-governmental entity and that the development of the requirements, rules, and policies operationalized by the tool are overseen by the state agency.

Function	Medicaid Agency	Contracted Entity
Participant waiver enrollment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Waiver enrollment managed against approved limits	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Waiver expenditures managed against approved levels	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Level of care waiver eligibility evaluation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Review of Participant service plans	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Prior authorization of waiver services	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Utilization management	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Qualified provider enrollment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Execution of Medicaid provider agreements	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Establishment of a statewide rate methodology	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Rules, policies, procedures and information development governing the waiver program	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Quality assurance and quality improvement activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

## Appendix A: Waiver Administration and Operation

### Quality Improvement: Administrative Authority of the Single State Medicaid Agency

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: Administrative Authority

*The Medicaid Agency retains ultimate administrative authority and responsibility for the operation of the waiver program by exercising oversight of the performance of waiver functions by other state and local/regional non-state agencies (if appropriate) and contracted entities.*

#### i. Performance Measures

*For each performance measure the state will use to assess compliance with the statutory assurance, complete the following. Performance measures for administrative authority should not duplicate measures found in other appendices of the waiver application. As necessary and applicable, performance measures should focus on:*

- Uniformity of development/execution of provider agreements throughout all geographic areas covered by the waiver
- Equitable distribution of waiver openings in all geographic areas covered by the waiver
- Compliance with HCB settings requirements and other new regulatory components (for waiver actions submitted on or after March 17, 2014)

*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:

**AA-2: Number and percent of months in a calendar quarter that each MCO reported all HCBS PM data measures. Numerator = # of months each MCO entered all required HCBS PM data; Denominator = # of reportable HCBS PM months in a calendar quarter.**

**Data Source** (Select one):

**Other**

If 'Other' is selected, specify:

**MCO performance monitoring**

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

**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> ):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input type="checkbox"/> Other Specify: <div></div>	<input type="checkbox"/> Annually

Responsible Party for data aggregation and analysis (check each that applies):	Frequency of data aggregation and analysis (check each that applies):
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>

**Performance Measure:**

**AA-1: Number and percent of required MCO HCBS PM quarterly reports that are submitted timely. Numerator = # of required MCO HCBS PM quarterly reports submitted timely; Denominator = # of MCO HCBS PM quarterly reports due in a calendar quarter.**

Data Source (Select one):

**Other**

If 'Other' is selected, specify:

**MCO performance monitoring**

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):
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input checked="" type="checkbox"/> 100% Review
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly	<input type="checkbox"/> Less than 100% Review
<input type="checkbox"/> Sub-State Entity	<input type="checkbox"/> Quarterly	<input type="checkbox"/> Representative Sample Confidence Interval = <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>
<input checked="" type="checkbox"/> Other Specify: <div style="border: 1px solid black; padding: 2px; margin-top: 5px;">MCOs</div>	<input type="checkbox"/> Annually	<input type="checkbox"/> Stratified Describe Group: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>
	<input type="checkbox"/> Continuously and Ongoing	<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>
	<input type="checkbox"/> Other Specify:	

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**Data Aggregation and Analysis:**

<b>Responsible Party for data aggregation and analysis (check each that applies):</b>	<b>Frequency of data aggregation and analysis (check each that applies):</b>
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>
<input type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>	<input type="checkbox"/> <b>Annually</b>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>
	<input type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>

- 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.

Through the Bureau of Managed Care each MCO is assigned state staff as the contract manager; and other state staff are assigned to aggregate and analyze MCO data. This staff oversees the quality and timeliness of monthly reporting requirements. Whenever data is late or missing the issues are immediately addressed by each MCO account manager to the respective MCO.

**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.

If the contract manager, or policy staff as a whole, discovers and documents a repeated deficiency in performance of the MCO, a plan for improved performance is developed. In addition, repeated deficiencies in contractual performance may result in a withholding of payment compensation.

General methods for problem correction include revisions to state contract terms based on lessons learned.

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

<b>Responsible Party (check each that applies):</b>	<b>Frequency of data aggregation and analysis (check each that applies):</b>
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input checked="" type="checkbox"/> <b>Monthly</b>

Responsible Party( <i>check each that applies</i> ):	Frequency of data aggregation and analysis ( <i>check each that applies</i> ):
<input type="checkbox"/> Sub-State Entity	<input type="checkbox"/> Quarterly
<input checked="" type="checkbox"/> Other Specify: <div>Contracted Entity and MCOs</div>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify: <div></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 Administrative Authority that are currently non-operational.

☒ No

☐ Yes

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

**Appendix B: Participant Access and Eligibility****B-1: Specification of the Waiver Target Group(s)**

**a. Target Group(s).** Under the waiver of Section 1902(a)(10)(B) of the Act, the state limits waiver services to one or more groups or subgroups of individuals. Please see the instruction manual for specifics regarding age limits. *In accordance with 42 CFR § 441.301(b)(6), select one or more waiver target groups, check each of the subgroups in the selected target group(s) that may receive services under the waiver, and specify the minimum and maximum (if any) age of individuals served in each subgroup:*

Target Group	Included	Target Sub Group	Minimum Age	Maximum Age	
				Maximum Age Limit	No Maximum Age Limit
<input type="checkbox"/> Aged or Disabled, or Both - General					
	<input type="checkbox"/>	Aged			<input type="checkbox"/>
	<input type="checkbox"/>	Disabled (Physical)			
	<input type="checkbox"/>	Disabled (Other)			
<input checked="" type="checkbox"/> Aged or Disabled, or Both - Specific Recognized Subgroups					
	<input type="checkbox"/>	Brain Injury			<input type="checkbox"/>
	<input checked="" type="checkbox"/>	HIV/AIDS	0		<input checked="" type="checkbox"/>
	<input type="checkbox"/>	Medically Fragile			<input type="checkbox"/>
	<input type="checkbox"/>	Technology Dependent			<input type="checkbox"/>
<input type="checkbox"/> Intellectual Disability or Developmental Disability, or Both					

Target Group	Included	Target Sub Group	Minimum Age	Maximum Age	
				Maximum Age Limit	No Maximum Age Limit
	<input type="checkbox"/>	Autism			<input type="checkbox"/>
	<input type="checkbox"/>	Developmental Disability			<input type="checkbox"/>
	<input type="checkbox"/>	Intellectual Disability			<input type="checkbox"/>
<input type="checkbox"/> Mental Illness					
	<input type="checkbox"/>	Mental Illness			<input type="checkbox"/>
	<input type="checkbox"/>	Serious Emotional Disturbance			

**b. Additional Criteria.** The state further specifies its target group(s) as follows:

Per 441 Iowa Administrative Code 83.42(1) individuals must be diagnosed by a physician as having AIDS or HIV infection.

**c. Transition of Individuals Affected by Maximum Age Limitation.** When there is a maximum age limit that applies to individuals who may be served in the waiver, describe the transition planning procedures that are undertaken on behalf of participants affected by the age limit (*select one*):

- ☒ **Not applicable. There is no maximum age limit**
- ☐ **The following transition planning procedures are employed for participants who will reach the waiver's maximum age limit.**

*Specify:*

## Appendix B: Participant Access and Eligibility

### B-2: Individual Cost Limit (1 of 2)

**a. Individual Cost Limit.** The following individual cost limit applies when determining whether to deny home and community-based services or entrance to the waiver to an otherwise eligible individual (*select one*). Please note that a state may have only ONE individual cost limit for the purposes of determining eligibility for the waiver:

- ☒ **No Cost Limit.** The state does not apply an individual cost limit. *Do not complete Item B-2-b or item B-2-c.*
- ☐ **Cost Limit in Excess of Institutional Costs.** The state refuses entrance to the waiver to any otherwise eligible individual when the state reasonably expects that the cost of the home and community-based services furnished to that individual would exceed the cost of a level of care specified for the waiver up to an amount specified by the state. *Complete Items B-2-b and B-2-c.*

**The limit specified by the state is (*select one*)**

- ☐ **A level higher than 100% of the institutional average.**

Specify the percentage:

- ☐ **Other**

*Specify:*

- 
- ☐ **Institutional Cost Limit.** Pursuant to 42 CFR § 441.301(a)(3), the state refuses entrance to the waiver to any otherwise eligible individual when the state reasonably expects that the cost of the home and community-based services furnished to that individual would exceed 100% of the cost of the level of care specified for the waiver. *Complete Items B-2-b and B-2-c.*
- ☐ **Cost Limit Lower Than Institutional Costs.** The state refuses entrance to the waiver to any otherwise qualified individual when the state reasonably expects that the cost of home and community-based services furnished to that individual would exceed the following amount specified by the state that is less than the cost of a level of care specified for the waiver.

*Specify the basis of the limit, including evidence that the limit is sufficient to assure the health and welfare of waiver participants. Complete Items B-2-b and B-2-c.*

The cost limit specified by the state is *(select one)*:

- ☐ The following dollar amount:

Specify dollar amount:

The dollar amount *(select one)*

- ☐ Is adjusted each year that the waiver is in effect by applying the following formula:

Specify the formula:

- ☐ May be adjusted during the period the waiver is in effect. The state will submit a waiver amendment to CMS to adjust the dollar amount.
- ☐ The following percentage that is less than 100% of the institutional average:

Specify percent:

- ☐ Other:

*Specify:*

## Appendix B: Participant Access and Eligibility

### B-2: Individual Cost Limit (2 of 2)

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Answers provided in Appendix B-2-a indicate that you do not need to complete this section.

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- b. Method of Implementation of the Individual Cost Limit.** When an individual cost limit is specified in Item B-2-a, specify the procedures that are followed to determine in advance of waiver entrance that the individual's health and welfare can be assured within the cost limit:



**c. Participant Safeguards.** When the state specifies an individual cost limit in Item B-2-a and there is a change in the participant's condition or circumstances post-entrance to the waiver that requires the provision of services in an amount that exceeds the cost limit in order to assure the participant's health and welfare, the state has established the following safeguards to avoid an adverse impact on the participant (*check each that applies*):

- ☐ The participant is referred to another waiver that can accommodate the individual's needs.
- ☐ Additional services in excess of the individual cost limit may be authorized.

Specify the procedures for authorizing additional services, including the amount that may be authorized:

- ☐ Other safeguard(s)

Specify:

## Appendix B: Participant Access and Eligibility

### B-3: Number of Individuals Served (1 of 4)

**a. Unduplicated Number of Participants.** The following table specifies the maximum number of unduplicated participants who are served in each year that the waiver is in effect. The state will submit a waiver amendment to CMS to modify the number of participants specified for any year(s), including when a modification is necessary due to legislative appropriation or another reason. The number of unduplicated participants specified in this table is basis for the cost-neutrality calculations in Appendix J:

Table: B-3-a

Waiver Year	Unduplicated Number of Participants
Year 1	50
Year 2	50
Year 3	50
Year 4	50
Year 5	50

**b. Limitation on the Number of Participants Served at Any Point in Time.** Consistent with the unduplicated number of participants specified in Item B-3-a, the state may limit to a lesser number the number of participants who will be served at any point in time during a waiver year. Indicate whether the state limits the number of participants in this way: (*select one*):

- ☒ The state does not limit the number of participants that it serves at any point in time during a waiver year.
- ☐ The state limits the number of participants that it serves at any point in time during a waiver year.

The limit that applies to each year of the waiver period is specified in the following table:

Table: B-3-b

Waiver Year	Maximum Number of Participants Served At Any Point During the Year
Year 1	33
Year 2	33
Year 3	33
Year 4	33
Year 5	33

## Appendix B: Participant Access and Eligibility

### B-3: Number of Individuals Served (2 of 4)

**c. Reserved Waiver Capacity.** The state may reserve a portion of the participant capacity of the waiver for specified purposes (e.g., provide for the community transition of institutionalized persons or furnish waiver services to individuals experiencing a crisis) subject to CMS review and approval. The state (*select one*):

- ☒ Not applicable. The state does not reserve capacity.
- ☐ The state reserves capacity for the following purpose(s).

## Appendix B: Participant Access and Eligibility

### B-3: Number of Individuals Served (3 of 4)

**d. Scheduled Phase-In or Phase-Out.** Within a waiver year, the state may make the number of participants who are served subject to a phase-in or phase-out schedule (*select one*):

- ☒ The waiver is not subject to a phase-in or a phase-out schedule.
- ☐ The waiver is subject to a phase-in or phase-out schedule that is included in Attachment #1 to Appendix B-3. This schedule constitutes an intra-year limitation on the number of participants who are served in the waiver.

**e. Allocation of Waiver Capacity.**

*Select one:*

- ☒ Waiver capacity is allocated/managed on a statewide basis.
- ☐ Waiver capacity is allocated to local/regional non-state entities.

Specify: (a) the entities to which waiver capacity is allocated; (b) the methodology that is used to allocate capacity and how often the methodology is reevaluated; and, (c) policies for the reallocation of unused capacity among local/regional non-state entities:

**f. Selection of Entrants to the Waiver.** Specify the policies that apply to the selection of individuals for entrance to the waiver:

Individuals are accepted into the AIDS/HIV waiver on a first come first served basis based on the date of application. The application process as specified in rules 441—76.1(249A) to 441—76.6(249A) are followed. The AIDS/HIV waiver does not have administrative rules to establish a waiting list for services. All eligible applicants will be issued a waiver slot for services.

## Appendix B: Participant Access and Eligibility

### B-3: Number of Individuals Served - Attachment #1 (4 of 4)

Answers provided in Appendix B-3-d indicate that you do not need to complete this section.

## Appendix B: Participant Access and Eligibility

### B-4: Eligibility Groups Served in the Waiver

**a. 1. State Classification.** The state is a (*select one*):

- ☒ Section 1634 State  
☐ SSI Criteria State  
☐ 209(b) State

**2. Miller Trust State.**

Indicate whether the state is a Miller Trust State (*select one*):

- ☐ No  
☒ Yes

**b. Medicaid Eligibility Groups Served in the Waiver.** Individuals who receive services under this waiver are eligible under the following eligibility groups contained in the state plan. The state applies all applicable federal financial participation limits under the plan. *Check all that apply:*

*Eligibility Groups Served in the Waiver (excluding the special home and community-based waiver group under 42 CFR § 435.217)*

- ☐ Parents and Other Caretaker Relatives (42 CFR § 435.110)  
☐ Pregnant Women (42 CFR § 435.116)  
☐ Infants and Children under Age 19 (42 CFR § 435.118)  
☒ SSI recipients  
☐ Aged, blind or disabled in 209(b) states who are eligible under 42 CFR § 435.121  
☒ Optional state supplement recipients  
☐ Optional categorically needy aged and/or disabled individuals who have income at:

*Select one:*

- ☐ 100% of the Federal poverty level (FPL)  
☐ % of FPL, which is lower than 100% of FPL.

Specify percentage:

- ☒ Working individuals with disabilities who buy into Medicaid (BBA working disabled group as provided in section 1902(a)(10)(A)(ii)(XIII) of the Act)  
☐ Working individuals with disabilities who buy into Medicaid (TWWIIA Basic Coverage Group as provided in section 1902(a)(10)(A)(ii)(XV) of the Act)  
☐ Working individuals with disabilities who buy into Medicaid (TWWIIA Medical Improvement Coverage Group as provided in section 1902(a)(10)(A)(ii)(XVI) of the Act)  
☐ Disabled individuals age 18 or younger who would require an institutional level of care (TEFRA 134 eligibility group as provided in section 1902(e)(3) of the Act)

- ☐ Medically needy in 209(b) States (42 CFR § 435.330)
- ☐ Medically needy in 1634 States and SSI Criteria States (42 CFR § 435.320, § 435.322 and § 435.324)
- ☒ Other specified groups (include only statutory/regulatory reference to reflect the additional groups in the state plan that may receive services under this waiver)

Specify:

Parents and other caretaker relatives specified at 42 CFR §435.110; pregnant women specified at 42 CFR §435.116; and children specified at 42 CFR §435.118.

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*Special home and community-based waiver group under 42 CFR § 435.217) Note: When the special home and community-based waiver group under 42 CFR § 435.217 is included, Appendix B-5 must be completed*

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- ☐ No. The state does not furnish waiver services to individuals in the special home and community-based waiver group under 42 CFR § 435.217. Appendix B-5 is not submitted.
- ☒ Yes. The state furnishes waiver services to individuals in the special home and community-based waiver group under 42 CFR § 435.217.

Select one and complete Appendix B-5.

- ☐ All individuals in the special home and community-based waiver group under 42 CFR § 435.217
- ☒ Only the following groups of individuals in the special home and community-based waiver group under 42 CFR § 435.217

Check each that applies:

- ☒ A special income level equal to:

Select one:

- ☒ 300% of the SSI Federal Benefit Rate (FBR)
- ☐ A percentage of FBR, which is lower than 300% (42 CFR § 435.236)

Specify percentage:

- ☐ A dollar amount which is lower than 300%.

Specify dollar amount:

- ☐ Aged, blind and disabled individuals who meet requirements that are more restrictive than the SSI program (42 CFR § 435.121)
- ☐ Medically needy without spend down in states which also provide Medicaid to recipients of SSI (42 CFR § 435.320, § 435.322 and § 435.324)
- ☐ Medically needy without spend down in 209(b) States (42 CFR § 435.330)
- ☐ Aged and disabled individuals who have income at:

Select one:

- ☐ 100% of FPL
- ☐ % of FPL, which is lower than 100%.

Specify percentage amount:

- ☐ Other specified groups (include only statutory/regulatory reference to reflect the additional groups in the state plan that may receive services under this waiver)

Specify:

## Appendix B: Participant Access and Eligibility

### B-5: Post-Eligibility Treatment of Income (1 of 7)

*In accordance with 42 CFR § 441.303(e), Appendix B-5 must be completed when the state furnishes waiver services to individuals in the special home and community-based waiver group under 42 CFR § 435.217, as indicated in Appendix B-4. Post-eligibility applies only to the 42 CFR § 435.217 group.*

- a. Use of Spousal Impoverishment Rules.** Indicate whether spousal impoverishment rules are used to determine eligibility for the special home and community-based waiver group under 42 CFR § 435.217:

*Note: For the period beginning January 1, 2014 and extending through September 30, 2027 (or other date as required by law), the following instructions are mandatory. The following box should be checked for all waivers that furnish waiver services to the 42 CFR § 435.217 group effective at any point during this time period.*

- ☒ **Spousal impoverishment rules under section 1924 of the Act are used to determine the eligibility of individuals with a community spouse for the special home and community-based waiver group. In the case of a participant with a community spouse, the state uses spousal post-eligibility rules under section 1924 of the Act.**  
*Complete Items B-5-e (if the selection for B-4-a-i is SSI State or section 1634) or B-5-f (if the selection for B-4-a-i is 209b State) and Item B-5-g unless the state indicates that it also uses spousal post-eligibility rules for the time period after September 30, 2027 (or other date as required by law).*

*Note: The following selections apply for the time period after September 30, 2027 (or other date as required by law) (select one).*

- ☒ **Spousal impoverishment rules under section 1924 of the Act are used to determine the eligibility of individuals with a community spouse for the special home and community-based waiver group.**

In the case of a participant with a community spouse, the state elects to (*select one*):

- ☒ **Use spousal post-eligibility rules under section 1924 of the Act.**  
*(Complete Item B-5-b (SSI State) and Item B-5-d)*
- ☐ **Use regular post-eligibility rules under 42 CFR § 435.726 (Section 1634 State/SSI Criteria State) or under § 435.735 (209b State)**  
*(Complete Item B-5-b (SSI State). Do not complete Item B-5-d)*
- ☐ **Spousal impoverishment rules under section 1924 of the Act are not used to determine eligibility of individuals with a community spouse for the special home and community-based waiver group. The state uses regular post-eligibility rules for individuals with a community spouse.**  
*(Complete Item B-5-b (SSI State). Do not complete Item B-5-d)*

## Appendix B: Participant Access and Eligibility

### B-5: Post-Eligibility Treatment of Income (2 of 7)

*Note: The following selections apply for the time period after September 30, 2027 (or other date as required by law).*

- b. Regular Post-Eligibility Treatment of Income: Section 1634 State and SSI Criteria State after September 30, 2027 (or other date as required by law).**

The state uses the post-eligibility rules at 42 CFR § 435.726 for individuals who do not have a spouse or have a spouse who is not a community spouse as specified in §1924 of the Act. Payment for home and community-based waiver services is reduced by the amount remaining after deducting the following allowances and expenses from the waiver participant's income:

- i. Allowance for the needs of the waiver participant (*select one*):**

- ☐ **The following standard included under the state plan**

Select one:

- ☐ SSI standard
- ☐ Optional state supplement standard
- ☐ Medically needy income standard
- ☐ The special income level for institutionalized persons

(select one):

- ☐ 300% of the SSI Federal Benefit Rate (FBR)
- ☐ A percentage of the FBR, which is less than 300%

Specify the percentage:

- ☐ A dollar amount which is less than 300%.

Specify dollar amount:

- ☐ A percentage of the Federal poverty level

Specify percentage:

- ☐ Other standard included under the state plan

Specify:

- ☐ The following dollar amount

Specify dollar amount:  If this amount changes, this item will be revised.

- ☐ The following formula is used to determine the needs allowance:

Specify:

- ☒ Other

Specify:

The following formula is used to determine the needs allowance: 300% of the SSI benefit and for participants who have a medical assistance income trust (Miller Trust) an additional \$10 (or higher if court ordered) to pay for administrative costs.

HHS determines patient liability. Client participation is the amount that a member is required to contribute toward the cost of waiver services. To calculate client participation:

1. Determine only the member's total gross monthly income.
  2. Subtract a maintenance needs allowance of 300% of the current SSI benefit for one person.
  3. For participants who have a medical assistance income trust (Miller Trust) subtract:
    - a. an additional \$10 for trustee fee
    - b. A deduction for spouse and/or dependent needs
  4. Add in veteran's aid and attendance, house-bound allowance, or other third-party payments not counted as income for eligibility.
- The result is the client participation amount.

**ii. Allowance for the spouse only (select one):**

- ☒ Not Applicable
- ☐ The state provides an allowance for a spouse who does not meet the definition of a community spouse in section 1924 of the Act. Describe the circumstances under which this allowance is provided:

*Specify:*

**Specify the amount of the allowance (select one):**

- ☐ SSI standard
- ☐ Optional state supplement standard
- ☐ Medically needy income standard
- ☐ The following dollar amount:

Specify dollar amount:  If this amount changes, this item will be revised.

- ☐ The amount is determined using the following formula:

*Specify:*

**iii. Allowance for the family (select one):**

- ☐ Not Applicable (see instructions)
- ☒ AFDC need standard
- ☐ Medically needy income standard
- ☐ The following dollar amount:

Specify dollar amount:  The amount specified cannot exceed the higher of the need standard for a family of the same size used to determine eligibility under the state's approved AFDC plan or the medically needy income standard established under 42 CFR § 435.811 for a family of the same size. If this amount changes, this item will be revised.

- ☐ The amount is determined using the following formula:

Specify:

☐ Other

Specify:

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**iv. Amounts for incurred medical or remedial care expenses not subject to payment by a third party, specified in 42 CFR § 435.726:**

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- a. Health insurance premiums, deductibles and co-insurance charges
- b. Necessary medical or remedial care expenses recognized under state law but not covered under the state's Medicaid plan, subject to reasonable limits that the state may establish on the amounts of these expenses.

Select one:

- ☐ **Not Applicable (see instructions)** *Note: If the state protects the maximum amount for the waiver participant, not applicable must be selected.*
- ☒ **The state does not establish reasonable limits.**
- ☐ **The state establishes the following reasonable limits**

Specify:

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## Appendix B: Participant Access and Eligibility

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### B-5: Post-Eligibility Treatment of Income (3 of 7)

*Note: The following selections apply for the time period after September 30, 2027 (or other date as required by law).*

- c. Regular Post-Eligibility Treatment of Income: 209(b) State or after September 30, 2027 (or other date as required by law).**

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**Answers provided in Appendix B-4 indicate that you do not need to complete this section and therefore this section is not visible.**

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## Appendix B: Participant Access and Eligibility

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### B-5: Post-Eligibility Treatment of Income (4 of 7)

*Note: The following selections apply for the time period after September 30, 2027 (or other date as required by law).*

- d. Post-Eligibility Treatment of Income Using Spousal Impoverishment Rules after September 30, 2027 (or other date as required by law)**

The state uses the post-eligibility rules of section 1924(d) of the Act (spousal impoverishment protection) to determine the contribution of a participant with a community spouse toward the cost of home and community-based care if it determines the individual's eligibility under section 1924 of the Act. There is deducted from the participant's monthly income a personal needs allowance (as specified below), a community spouse's allowance and a family allowance as specified in the state Medicaid Plan. The state must also protect amounts for incurred expenses for medical or remedial care (as specified



below).

**i. Allowance for the personal needs of the waiver participant**

(select one):

- ☐ SSI standard
- ☐ Optional state supplement standard
- ☐ Medically needy income standard
- ☐ The special income level for institutionalized persons
- ☐ A percentage of the Federal poverty level

Specify percentage:

- ☐ The following dollar amount:

Specify dollar amount:  If this amount changes, this item will be revised

- ☐ The following formula is used to determine the needs allowance:

Specify formula:

- ☒ Other

Specify:

300% of the SSI benefit and for participants who have a medical assistance income trust (Miller Trust) an additional \$10 (or higher if court ordered) to pay for administrative costs.

HHS determines patient liability. Client participation is the amount that a member is required to contribute toward the cost of waiver services. To calculate client participation:

1. Determine only the member's total gross monthly income.
  2. Subtract a maintenance needs allowance of 300% of the current SSI benefit for one person.
  3. Add in veteran's aid and attendance and veteran's housebound allowance.
- The result is the client participation amount.

4. The IMW makes client participation entries on the Automated Benefit Calculation (ABC) system. The IMW notifies the HCBS case manager of the type and amount of client participation to be paid, if any. It is a HCBS case manager's responsibility to apply the client participation toward a specific service.

For managed care enrollees with a patient liability, HHS will communicate to the MCO the amount of each member's liability. Members will be responsible for remitting their patient liability to their waiver providers. The MCO reduces its payment for a member's waiver services up to the amount of the patient liability.

The capitation rates calculated for MCOs includes a long-term services and supports (LTSS) component which is a blend of institutional services and home and community based services (HCBS). When capitation rates were developed, the LTSS component was calculated with consideration given to patient liability as a possible source of funds used to pay a portion of the services provided through the waiver. For both the institutional and HCBS component of the rate, the average patient liability was subtracted. Therefore, the MCOs are paid net of the average patient liability.

**ii. If the allowance for the personal needs of a waiver participant with a community spouse is different from the amount used for the individual's maintenance allowance under 42 CFR § 435.726 or 42 CFR § 435.735, explain why this amount is reasonable to meet the individual's maintenance needs in the community.**

Select one:

- ☒ Allowance is the same
- ☐ Allowance is different.

*Explanation of difference:*

**iii. Amounts for incurred medical or remedial care expenses not subject to payment by a third party, specified in 42 CFR § 435.726 or 42 CFR § 435.735:**

- a. Health insurance premiums, deductibles and co-insurance charges
- b. Necessary medical or remedial care expenses recognized under state law but not covered under the state's Medicaid plan, subject to reasonable limits that the state may establish on the amounts of these expenses.

Select one:

- ☐ **Not Applicable (see instructions)** *Note: If the state protects the maximum amount for the waiver participant, not applicable must be selected.*
- ☒ **The state does not establish reasonable limits.**
- ☐ **The state uses the same reasonable limits as are used for regular (non-spousal) post-eligibility.**

## Appendix B: Participant Access and Eligibility

### B-5: Post-Eligibility Treatment of Income (5 of 7)

*Note: The following selections apply for the period beginning January 1, 2014 and extending through September 30, 2027 (or other date as required by law).*

- e. Regular Post-Eligibility Treatment of Income: Section 1634 State or SSI Criteria State – January 1, 2014 through September 30, 2027 (or other date as required by law).**

Answers provided in Appendix B-5-a indicate the selections in B-5-b also apply to B-5-e.

## Appendix B: Participant Access and Eligibility

### B-5: Post-Eligibility Treatment of Income (6 of 7)

*Note: The following selections apply for the period beginning January 1, 2014 and extending through September 30, 2027 (or other date as required by law).*

- f. Regular Post-Eligibility Treatment of Income: 209(b) State – January 1, 2014 through September 30, 2027 (or other date as required by law).**

Answers provided in Appendix B-4 indicate that you do not need to complete this section and therefore this section is not visible.

## Appendix B: Participant Access and Eligibility

### B-5: Post-Eligibility Treatment of Income (7 of 7)

*Note: The following selections apply for the period beginning January 1, 2014 and extending through September 30, 2027 (or other date as required by law).*

- g. Post-Eligibility Treatment of Income Using Spousal Impoverishment Rules – January 1, 2014 through September 30, 2027 (or other date as required by law).**

The state uses the post-eligibility rules of section 1924(d) of the Act (spousal impoverishment protection) to determine the

contribution of a participant with a community spouse toward the cost of home and community-based care. There is deducted from the participant's monthly income a personal needs allowance (as specified below), a community spouse's allowance and a family allowance as specified in the state Medicaid Plan. The state must also protect amounts for incurred expenses for medical or remedial care (as specified below).

**Answers provided in Appendix B-5-a indicate the selections in B-5-d also apply to B-5-g.**

## Appendix B: Participant Access and Eligibility

### B-6: Evaluation/Reevaluation of Level of Care

*As specified in 42 CFR § 441.302(c), the state provides for an evaluation (and periodic reevaluations) of the need for the level(s) of care specified for this waiver, when there is a reasonable indication that an individual may need such services in the near future (one month or less), but for the availability of home and community-based waiver services.*

- a. Reasonable Indication of Need for Services.** In order for an individual to be determined to need waiver services, an individual must require: (a) the provision of at least one waiver service, as documented in the service plan, and (b) the provision of waiver services at least monthly or, if the need for services is less than monthly, the participant requires regular monthly monitoring which must be documented in the service plan. Specify the state's policies concerning the reasonable indication of the need for services:

**i. Minimum number of services.**

The minimum number of waiver services (one or more) that an individual must require in order to be determined to need waiver services is:

**ii. Frequency of services.** The state requires (select one):

- ☐ The provision of waiver services at least monthly
- ☒ Monthly monitoring of the individual when services are furnished on a less than monthly basis

*If the state also requires a minimum frequency for the provision of waiver services other than monthly (e.g., quarterly), specify the frequency:*

HCBS waiver services must be accessed at least once every calendar quarter by the member.

As part of HCBS waiver enrollment, case management is required for each participant, regardless of delivery system. Following the first three months, the Case Managers must complete at least one contact per month with the individual or their authorized representative in order to establish access to services and to ensure the authorized services are provided as outlined in the participant's service plan to ensure the participant's health, safety and welfare. This contact may be face-to-face, virtual, or via telehealth. Written communication does not constitute contact unless there are extenuating circumstances outlined in the enrollee's individualized service plan (ISP).

- If the individual has been diagnosed with an Intellectual and/or Developmental Disability, Case Managers must complete at least one, in-home, face-to-face contact every other month
- For those who are not diagnosed with Intellectual and/or Developmental Disability, the Case Manager must complete at least one, in-home, face-to-face contact every three months.

- b. Responsibility for Performing Evaluations and Reevaluations.** Level of care evaluations and reevaluations are performed (*select one*):

- ☐ Directly by the Medicaid agency
- ☐ By the operating agency specified in Appendix A
- ☐ By an entity under contract with the Medicaid agency.

*Specify the entity:*

Ⓒ **Other**

*Specify:*

The Iowa Medicaid QIO Medical Services Unit is responsible for making all initial level of care decisions. Iowa Medicaid's CSA contractor performs the assessment. LOC decisions also include input from the case manager, community-based case manager, medical professional, and other appropriate professionals. For fee-for-service members, the reevaluation is also conducted by the Iowa Medicaid CSA contractor. The Iowa Medicaid QIO Medical Services Unit reviews and approves all reevaluations that indicate a change in the member's level of care. MCOs are responsible for developing and implementing policies and procedures for ongoing identification of members who may be eligible for waiver services. Upon identification the CSA contractor completes the initial level of care assessment with the Iowa Medicaid QIO Medical Services Unit maintaining final review and approval authority.

- c. Qualifications of Individuals Performing Initial Evaluation:** Per 42 CFR § 441.303(c)(1), specify the educational/professional qualifications of individuals who perform the initial evaluation of level of care for waiver applicants:

Medical professionals (i.e., licensed physician, physician assistant or advanced registered nurse practitioner) perform the initial evaluation/completion of the assessment tool. Iowa Medicaid requires that professionals completing the level of care determination are licensed RNs. If the RN is unable to approve level of care, then the Physician Assistant or MD make the final level of care determination.

- d. Level of Care Criteria.** Fully specify the level of care criteria that are used to evaluate and reevaluate whether an individual needs services through the waiver and that serve as the basis of the state's level of care instrument/tool. Specify the level of care instrument/tool that is employed. State laws, regulations, and policies concerning level of care criteria and the level of care instrument/tool are available to CMS upon request through the Medicaid agency or the operating agency (if applicable), including the instrument/tool utilized.

Iowa Medicaid Medical Services uses the following assessments to evaluate and reevaluate applicants and members:  
 Ages 0 – 3 interRAI- Early Years (EY)  
 Ages 4 -20 interRAI – Pediatric Home Care (PEDS-HC)  
 Ages 21 and older interRAI – Home Care (HC)

The interRAI Early Years Assessment System (EY) is a tool intended for use with young children with developmental and mental health concerns and includes identification of family support needs. The assessment tool enables comprehensive care planning in community-based settings. This tool is compatible with other interRAI assessments for children. The interRAI EY system comes equipped with scales, care-planning protocols, algorithms, and quality indicators. The Early Years tool identifies medical, social, psychological, developmental, and behavioral needs and provides an extensive understanding of a child's strengths, needs and preferences across medical, social, developmental, and behavioral domains.

**interRAI – Home Care Assessments**

The interRAI Home Care Assessment System (HC) has been designed to be a user-friendly, reliable, person-centered assessment system that informs and guides comprehensive care and service planning in community-based settings around the world. It focuses on the person's functioning and quality of life by assessing needs, strengths, and preferences, and facilitates referrals when appropriate. When used over time, it provides the basis for an outcome-based assessment of the person's response to care or services. The interRAI HC can be used to assess adults with chronic needs for care as well as those with post-acute care needs (for example, after hospitalization or in a hospital-at-home situation). The PEDS-HC instrument is designed to be used to assess the home care challenges of children and youths ranging in age from 4 through 20 who are seeking or receiving long-term services or supports. Areas of interRAI review include: (1) cognitive; (2) mood and behavior patterns; (3) physical functioning – mobility; (4) skin condition; (5) pulmonary status; (6) continence; (7) dressing and personal hygiene – ADLS; (8) physical functioning – eating; (9) medications; (10) communication/hearing/vision patterns; and (11) prior living - psychosocial. The interRAI HC and the interRAI PEDS-HC instruments assess the same areas of need.

- e. Level of Care Instrument(s).** Per 42 CFR § 441.303(c)(2), indicate whether the instrument/tool used to evaluate level of

care for the waiver differs from the instrument/tool used to evaluate institutional level of care (*select one*):

- ☐ The same instrument is used in determining the level of care for the waiver and for institutional care under the state plan.
- ☒ A different instrument is used to determine the level of care for the waiver than for institutional care under the state plan.

Describe how and why this instrument differs from the form used to evaluate institutional level of care and explain how the outcome of the determination is reliable, valid, and fully comparable.

The interRAI HC Assessment Form is a Minimum Data Set screening tool that enables a trained assessor to assess multiple key domains of function, health, social support and service use. Particular interRAI HC items also identify persons who could benefit from further evaluation of specific problems or risks for functional decline. These are triggers that link the interRAI HC to a Clinical Assessment Protocol (CAP). The CAPs contain general guidelines for further assessment.

The HC system supports a variety of research-informed decision support tools that assist the assessor in planning and monitoring care. These include:

\*Scales for ADLs, cognition, communication, pain, depression, and medical instability

\*Clinical Assessment Protocols that contain strategies to address problem conditions as triggered by one or more HC item responses

\*Screening systems to identify appropriate outreach and care pathways for prospective clients (the MI Choice and MAPLe systems)

\*A quality monitoring system (Home Care Quality Indicators, or HCQIs)

\*A case-mix system that creates distinct service-use intensity categories (RUG-III/HC)

Iowa Medicaid Medical Services may request additional information from the service worker, case manager, or community-based case manager to clarify or supplement the information submitted with the assessment. The results of the assessment are used to develop the plan of care. Because the same criteria are used for both institutional care and waiver services, the outcome is reliable, valid, and fully comparable.

**f. Process for Level of Care Evaluation/Reevaluation:** Per 42 CFR § 441.303(c)(1), describe the process for evaluating waiver applicants for their need for the level of care under the waiver. If the reevaluation process differs from the evaluation process, describe the differences:

It is the responsibility of the case manager, or community-based case manager to assure the assessment is initiated as required to complete the initial level of care determination. The initial assessment is completed by the Core Standardized Assessment (CSA) contractor Telligen and sent to the case manager who uploads the assessment to the Iowa Medicaid QIO MSU. The Iowa Medicaid QIO MSU is responsible for determining the level of care based on the completed assessment tool and supporting documentation from medical professionals.

The Continued Stay Review (CSR) is completed annually and when the case manager becomes aware that the member's functional or medical status has changed in a way that may affect level of care eligibility. The CSR process uses the same assessment tool as is used with the initial level of care determination. It is the responsibility of the case manager to assure the assessment is initiated as required to complete the CSR. For fee-for-service members, the IoWANS system sends out a milestone 60 days prior to the CSR date to remind case managers of the upcoming annual LOC process. The CSA contractor completes these assessments, and the Iowa Medicaid QIO MSU conduct LOC redeterminations.

The CSA contractor is responsible for conducting level of care reevaluations for members, using HHS designated tools, at least annually, and when the MCO becomes aware that the member's functional or medical status has changed in a way that may affect level of care eligibility. Additionally, any member or provider can request a reevaluation at any time. Once the reevaluation is complete, the CSA submits the level of care or functional eligibility information to the Iowa Medicaid QIO MSU. The State retains authority for determining Medicaid categorical, financial, level of care or needs-based eligibility and enrolling members into a Medicaid eligibility category. MCOs track and report level of care and needs-based eligibility reevaluation data, including, but not limited to, reevaluation completion date. CSA is required to notify HHS of any change in level of care and HHS retains final level of care determination authority. As the State is a neutral third party with final approval authority, there is no conflict of interest.

MCOs are contractually required to develop and maintain their own electronic community-based case management systems that include functionality to ensure compliance with the State's 1915(c) HCBS waiver and law. This includes, but is not limited to, the ability to capture and track: (i) key dates and timeframes such as enrollment date, date of development of the care plan, date of care plan authorization, date of initial service delivery, date of level of care and needs reassessments and dates of care plan updates and the functionality to notify the community-based case manager of care plan, assessment and reassessment deadlines; (ii) the care plan; (iii) all referrals; (iv) needs assessments and reassessments; (v) service delivery against authorized services and providers; (vi) actions taken by the community-based case manager to address service gaps; and (vii) case notes.

MCOs are required to employ the same professionals. Further, MCOs are contractually required to ensure on an ongoing basis that all staff has the appropriate credentials, education, experience and orientation to fulfill the requirements of their position. As applicable based on the scope of services provided under a subcontract, MCOs must ensure all subcontractor staff is trained as well. Staff training shall include, but is not limited to: (i) contract requirements and State and Federal requirements specific to job functions; (ii) training on the MCOs policies and procedures on advance directives; (iii) initial and ongoing training on identifying and handling quality of care concerns; (iv) cultural sensitivity training; (v) training on fraud and abuse and the False Claims Act; (vi) HIPAA training; (vii) clinical protocol training for all clinical staff; (viii) ongoing training, at least quarterly, regarding interpretation and application of utilization management guidelines for all utilization management staff; (ix) assessment processes, person-centered planning and population specific training relevant to the enrolled populations for all care managers; and (x) training and education to understand abuse, neglect, exploitation and prevention including the detection, mandatory reporting, investigation and remediation procedures and requirements. Policies and Procedures Manuals must also be provided to the MCO's entire staff and be incorporated into all training programs for staff responsible for providing services. Finally, MCOs must maintain documentation to confirm staff training, curriculum, schedules and attendance. HHS reserves the right to review training documentation and require the MCO to implement additional staff training.

**g. Reevaluation Schedule.** Per 42 CFR § 441.303(c)(4), reevaluations of the level of care required by a participant are conducted no less frequently than annually according to the following schedule (*select one*):

- ☐ Every three months
- ☐ Every six months
- ☒ Every twelve months
- ☐ Other schedule

*Specify the other schedule:*

**h. Qualifications of Individuals Who Perform Reevaluations.** Specify the qualifications of individuals who perform reevaluations (*select one*):

- ☒ **The qualifications of individuals who perform reevaluations are the same as individuals who perform initial evaluations.**
- ☐ **The qualifications are different.**  
Specify the qualifications:

**i. Procedures to Ensure Timely Reevaluations.** Per 42 CFR § 441.303(c)(4), specify the procedures that the state employs to ensure timely reevaluations of level of care (*specify*):

The CSA contactor is responsible for submitting LOC reevaluations of members within twelve (12) months of the previous evaluation. Reevaluations are tracked in the HHS Institutional and Waiver Authorization and Narrative System (IoWANS). An IoWANS milestone is sent out to the CSA contractor 60 days before the reevaluation is due.

One hundred percent (100%) of member LOC reevaluations must be completed within twelve (12) months of the previous evaluation. On a weekly basis, an IoWANS CSR report is extracted to identify overdue reevaluations and sent to the management team for HHS CSA management for resolution. The HHS CSA management submits a weekly status report to the designated HCBS program manager for monitoring with conferencing as needed.

A CSR or re-evaluation report is also available through IoWANS to track overdue reevaluations and is monitored by Iowa Medicaid.

Should reevaluations not be completed in a timely manner, HHS may require corrective action(s) and implement intermediate sanctions in accordance with 42 CFR 438, Subpart I. The nature of the corrective action(s) will depend upon the nature, severity and duration of the deficiency and repeated nature of the non-compliance. The non-compliance corrective actions may be instituted in any sequence and include, but are not limited to, a written warning, formal corrective action plan, and contract termination. In the event of non-compliance with reevaluation timelines, the CSA contractor must: (i) immediately remediate all individual findings identified through its monitoring process; (ii) track and trend such findings and remediation to identify systemic issues of marginal performance and/or non-compliance; (iii) implement strategies to improve community-based case management processes and resolve areas of non-compliance or member dissatisfaction; and (iv) measure the success of such strategies in addressing identified issues.

**j. Maintenance of Evaluation/Reevaluation Records.** Per 42 CFR § 441.303(c)(3), the state assures that written and/or electronically retrievable documentation of all evaluations and reevaluations are maintained for a minimum period of 3 years as required in 45 CFR § 92.42. Specify the location(s) where records of evaluations and reevaluations of level of care are maintained:

All evaluation and reevaluation level of care documents are faxed to the MSU regardless of delivery system (i.e., FFS members and MCO members) and placed in "OnBase." OnBase is the system that stores documents electronically and establishes workflow. In addition, the waiver member's case manager or community-based case manager is responsible for service coordination for each member. These providers maintain a working case file for each member and must maintain the records for a period of five years from the date of service. The case file includes all assessments, both initial and ongoing, completed during the time the member was receiving waiver services. MCOs also maintain electronic case management systems that are used to capture and track all evaluations and reevaluations.

## Appendix B: Evaluation/Reevaluation of Level of Care

### Quality Improvement: Level of Care

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: Level of Care Assurance/Sub-assurances**

*The state demonstrates that it implements the processes and instrument(s) specified in its approved waiver for evaluating/reevaluating an applicant's/waiver participant's level of care consistent with level of care provided in a hospital, NF or ICF/IID.*

**i. Sub-Assurances:**

- a. Sub-assurance:** *An evaluation for LOC is provided to all applicants for whom there is reasonable indication that services may be needed in the future.*

**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:**

**LC-a1: Number and percent of referrals for LOC that received a completed LOC decision. Numerator: # of referrals for LOC that received a completed LOC decision; Denominator: # of referrals for LOC.**

**Data Source** (Select one):

**Other**

If 'Other' is selected, specify:

**FFS and MCO members will be pulled from IoWANS for this measure. Iowa Medicaid MSU completes all initial level of care determinations for both FFS and MCO populations.**

<b>Responsible Party for data collection/generation</b> (check each that applies):	<b>Frequency of data collection/generation</b> (check each that applies):	<b>Sampling Approach</b> (check each that applies):
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input checked="" type="checkbox"/> 100% Review
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly	<input type="checkbox"/> Less than 100% Review
<input type="checkbox"/> Sub-State Entity	<input type="checkbox"/> Quarterly	<input type="checkbox"/> Representative Sample Confidence Interval = <div style="border: 1px solid black; height: 20px; width: 100px; margin-top: 5px;"></div>
<input checked="" type="checkbox"/> Other Specify:	<input type="checkbox"/> Annually	<input type="checkbox"/> Stratified Describe Group:



contracted entity		
	<input type="checkbox"/> Continuously and Ongoing	<input type="checkbox"/> Other Specify:  
	<input type="checkbox"/> Other Specify:  	

**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):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input type="checkbox"/> Other Specify:  	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify:  

- b. Sub-assurance:** *The levels of care of enrolled participants are reevaluated at least annually or as specified in the approved waiver.*

**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.

- c. **Sub-assurance:** *The processes and instruments described in the approved waiver are applied appropriately and according to the approved description to determine participant level of care.*

#### 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:

**LC-c1: Number and percent of initial level of care decisions that were accurately determined by applying the approved LOC criterion using standard operating procedures. Numerator: # of initial LOC decisions that were accurately determined by applying the approved LOC criterion using standard operating procedures; Denominator: # of reviewed initial LOC determinations**

**Data Source** (Select one):

**Other**

If 'Other' is selected, specify:

**Iowa Medicaid MQIDS and OnBase**

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):
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input type="checkbox"/> 100% Review
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly	<input checked="" type="checkbox"/> Less than 100% Review
<input type="checkbox"/> Sub-State Entity	<input type="checkbox"/> Quarterly	<input checked="" type="checkbox"/> Representative Sample Confidence Interval = <div style="border: 1px solid black; padding: 5px; margin-top: 10px;">             95% confidence level with +/- 5% margin of error           </div>
<input checked="" type="checkbox"/> Other Specify:	<input type="checkbox"/> Annually	<input checked="" type="checkbox"/> Stratified Describe Group:

Contracted Entity		IA.0299 - BI (6%) IA.0213- AIDS/HIV (.05%) IA.0242 - ID (47%) IA.0345 - PD (4%) IA.0819 - CMH (4%) IA.4111 - HD (9%) IA.4155 - Elderly (30%)
	<input type="checkbox"/> <b>Continuously and Ongoing</b>	<input type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; height: 20px; width: 100%;"></div>
	<input type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	

**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> ):
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>
<input type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<input type="checkbox"/> <b>Annually</b>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>
	<input type="checkbox"/> <b>Other</b> Specify:

Responsible Party for data aggregation and analysis (check each that applies):	Frequency of data aggregation and analysis (check each that applies):

- 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.

Data for completed LOC is collected quarterly through reports generated through IoWANS, MQUIDS, and OnBase. This data is monitored for trends from an individual and systems perspective.

Monthly a random sample of LOC decisions is selected from each reviewer. Internal Quality Control activity is completed on the random sample. This level of scrutiny aids in early detection of variance from the stated LOC criteria.

#### 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.

The state's QIO Medical Services Unit performs internal quality reviews of initial and annual level of care determinations to ensure that the proper criteria are applied. In instances when it is discovered that this has not occurred, the unit undertakes additional training for staff.

When an eligibility approval is made in error, the State allows for timely notice and discontinues the participant's benefits. All payments that were made for services, in which the participant was not actually eligible for, are deemed as an error and an overpayment is set to be collected from the participant. The eligibility worker reaches out to the participant at that time, explains to them what happened and encourages them to not use any additional services that will need to be repaid. If the participant is only eligible due to being eligible for the waiver, all Medicaid and waiver payments will be subject to the overpayment. If the participant is eligible for Medicaid on their own right, then only the waiver services are subject to the overpayment recoupment.

#### ii. Remediation Data Aggregation

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

Responsible Party (check each that applies):	Frequency of data aggregation and analysis (check each that applies):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input type="checkbox"/> Other Specify: <div></div>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify: <div></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 Level of Care that are currently non-operational.

☒ No

☐ Yes

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

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## Appendix B: Participant Access and Eligibility

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### B-7: Freedom of Choice

**Freedom of Choice.** As provided in 42 CFR § 441.302(d), when an individual is determined to be likely to require a level of care for this waiver, the individual or his or her legal representative is:

- i. informed of any feasible alternatives under the waiver; and
- ii. given the choice of either institutional or home and community-based services.

**a. Procedures.** Specify the state's procedures for informing eligible individuals (or their legal representatives) of the feasible alternatives available under the waiver and allowing these individuals to choose either institutional or waiver services. Identify the form(s) that are employed to document freedom of choice. The form or forms are available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

**FFS**

HHS is dedicated to serving individuals in the communities of their choice within the resources available and to implementing the United States Supreme Court's mandate in *Olmsted v. L.C.* As such, services are provided in a manner that facilitates maximum community placement and participation for members that require LTSS.

In accordance with 42 CFR 441.301 and the Iowa Administrative Code 441-90.5(1)b and 441-83, service plans must reflect the services and supports that are important for the member to meet the needs identified through the needs assessment, as well as what is important to the member with regard to preferences for the delivery of such services and supports. The service plan, developed through a "person-centered" planning process, must reflect the member's needs and preferences and how those needs will be met by a combination of covered services and available community supports.

The person-centered process is holistic in addressing the full array of medical and non-medical services and supports to ensure the maximum degree of integration and the best possible health outcomes and member satisfaction. Moreover, members are given the necessary information and support to ensure their direction of the process to the maximum extent possible, and to empower them to make informed choices and decisions regarding the services and supports received.

During enrollment of fee-for-service members, IoWANS requires that case managers (CM) attest to having offered a choice between HCBS or institutional services. Choice is verified by: (1) marking the waiver box on the application; (2) sending a written request asking for waiver services; or (3) verbally confirming the member's choice with the income maintenance worker and the case manager documents the conversation.

Further, there are waiver informational brochures available to share with members and their parents/guardians. Brochures are available at each of the HHS county offices. Information is also available on the Iowa Medicaid and MCO websites. The brochures include information on eligibility, service descriptions, and the application process. Once a member begins the enrollment process and has a case manager or community-based case manager assigned, a more detailed review of services and providers that are available in the area occurs as part of the planning process for developing a member's plan of care.

**MCO**

MCO community case managers are required to ensure that members are offered choice according to their respective MCO processes and forms, which are reviewed and approved by HHS. The MCOs provide oversight of service planning by reviewing the person-centered service plan to determine if choice between waiver and institutional care has been provided and provider choice is offered.

The HCBS QIO Unit will review person centered service plans to determine that there is documentation that HCBS provider choice was offered.

Iowa Medicaid's contractor for HCBS Oversight conducts monthly ride-along activities for MCO service plan coordination and evaluates compliance with service planning requirements, including choice between institutional and HCBS services. Feedback is provided to the MCO account managers, who then follow up on any necessary corrective actions.

- b. Maintenance of Forms.** Per 45 CFR § 92.42, written copies or electronically retrievable facsimiles of Freedom of Choice forms are maintained for a minimum of three years. Specify the locations where copies of these forms are maintained.

**FFS**

Freedom of Choice forms for fee-for-service members is documented in member service plans and in IoWANS.

**MCO**

MCOs are responsible for maintaining records that fully disclose the extent of services provided to members for a minimum of seven years and must furnish such information to duly authorized and identified agents or representatives of the state and federal governments. The MCOs maintain copies of freedom of choice forms in the MCO database and the member's electronic health record.

**Access to Services by Limited English Proficient Persons.** Specify the methods that the state uses to provide meaningful access to the waiver by Limited English Proficient persons in accordance with the Department of Health and Human Services "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (68 FR 47311 - August 8, 2003):

Iowa HHS adopts the policy as set forth in Title VI of the Civil Rights Act prohibiting national origin discrimination as it affects people with limited English proficiency. HHS shall provide for communication with people with limited English proficiency, including current and prospective patients or clients, family members and members to ensure them an equal opportunity to benefit from services. HHS has developed policies and procedures to ensure meaningful access for people with limited English proficiency. This includes procedures to:

- Identify the points of contact where language assistance is needed.
- Identify translation and interpretation resources, including their location and their availability.
- Arrange to have these resources available in timely manner.
- Determine the written materials and vital documents to be translated, based on the populations with limited English proficiency and ensure their transition.
- Determine effective means for notifying people with limited English proficiency of available translation services available at no cost.
- Train department staff on limited English proficiency requirements and ensure their ability to carry them out.
- Monitor the application of these policies on at least an annual basis to ensure ongoing meaningful access to services.

All applications and informational handouts are printed in Spanish. In addition, the contract with Iowa Medicaid Member Services requires that a bilingual staff person be available to answer all telephone calls, emails and written inquires. They also work with interpreters if another spoken language is needed. All local HHS offices have access to a translator if a bilingual staff person is not available. HHS includes this policy as part of their Policy on Nondiscrimination that can be found in the HHS Title I General Departmental Procedures in the Department Employee Manual.

Locally, each county HHS office utilizes the resources that are available to them. For example, in larger metropolitan areas, local offices have staff that are fluent in Spanish, Bosnian, and Southeastern Asian languages. Some offices utilize translators from HHS Refugee Services. Other areas of the state have high Russian populations and access the translators in the area. All county offices have access to the Language Line service where they may place a telephone call and request a translator when one is not available at the local office. Medicaid members may call Iowa Medicaid Member Services unit with any questions relating to Medicaid, including waiver services. Member Services has translation capabilities similar to the local HHS offices and uses the Language Line to address any language when Member Services does not have an interpreter on staff.

- MCOs must conform to HHS policies regarding meaningful access to the waiver by limited English proficient persons, and to deliver culturally competent services in accordance with 42 CFR 438.206.
- MCOs must provide language services at no cost to limited English proficiency members, and all written materials shall be provided in English and Spanish, as well as any additional prevalent languages identified by the State or through an analysis of member enrollment (i.e., any language spoken by at least five percent (5%) of the general population in the MCO's service area).
- MCOs must provide oral interpretation services free of charge to each member (this applies to all non-English languages, and is not limited to prevalent languages), and MCOs must notify all members that oral interpretation and translated written information is available and how to access those services. Written materials must include taglines in prevalent languages regarding how to access materials in alternative languages.
- MCOs must ensure that service plans reflect cultural considerations of the member and that service plan development is conducted by providing information in plain language and in a manner that is accessible to individuals with disabilities and persons who are limited English proficient, consistent with 42 CFR 435.905(b).
- MCOs must operate member services helplines that are available to all callers, and an automated telephone menu options must be made available in English and Spanish.
- MCOs must maintain member websites and mobile applications available in English and Spanish that are accessible and functional via cell phone.

All MCO developed member communications, including substantive changes to previously approved communications, must be approved by HHS prior to use/distribution.

## Appendix C: Participant Services

### C-1: Summary of Services Covered (1 of 2)

**a. Waiver Services Summary.** List the services that are furnished under the waiver in the following table. If case management is not a service under the waiver, complete items C-1-b and C-1-c:

Service Type	Service		
Statutory Service	Adult Day Care		
Statutory Service	Respite		
Extended State Plan Service	Home Health Aide		
Extended State Plan Service	Nursing		
Supports for Participant Direction	Financial Management Services		
Supports for Participant Direction	Independent Support Broker		
Other Service	Attendant Care		
Other Service	Counseling		
Other Service	Home Delivered Meals		
Other Service	Home Maintenance Support		
Other Service	Individual Directed Goods and Services		
Other Service	Self Directed Community Support and Employment		
Other Service	Skilled Attendant Care		

## Appendix C: Participant Services

### C-1/C-3: Service Specification

State laws, regulations and policies referenced in the specification are readily available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

**Service Type:**

Statutory Service

**Service:**

Adult Day Health

**Alternate Service Title (if any):**

Adult Day Care

**HCBS Taxonomy:**

**Category 1:**

04 Day Services

**Sub-Category 1:**

04060 adult day services (social model)

**Category 2:**

04 Day Services

**Sub-Category 2:**

04050 adult day health

**Category 3:**

**Sub-Category 3:**

**Category 4:**

**Sub-Category 4:**



**Service Definition** (*Scope*):

Adult Day Care services provide an organized program of supportive care in a group or an individual's environment to persons who need a degree of supervision and assistance on regular or intermittent basis in a day care center or in the home due to the absence of the primary caregiver. Supports provided during day care are protective oversight, supervision, and support with activities of daily living (ADLs) and instrumental activities of daily living (IADLs). Included are personal care (i.e.: ambulation, toileting, feeding, medications), behavioral support, or intermittent health-related cares, not otherwise paid under other waiver or state plan programs.

Meals provided as part of these services shall not constitute a full nutritional day; each meal is to provide 1/3 of daily dietary allowances.

Transportation is not a required element of Adult Day Care but if the cost of transportation is provided and charged to Medicaid, the cost of transportation must be included in the Adult Day Care per diem. If transportation to and from Adult Day Care is needed (based on the Adult Day Care provider's transportation), the case manager will authorize and monitor the authorized transportation as needed.

Adult Day Care does not cover therapies: occupational therapy, physical therapy, or speech therapy. The person-centered service plan will address how the person's needs are met. Services must be authorized in the person-centered service plan and monitored by the case manager.

Adult day care services occur in nonresidential settings that have been assessed to meet the HCBS settings requirements and adult day care in the home occurs in the member's own home.

**Specify applicable (if any) limits on the amount, frequency, or duration of this service:**

MA unit of service is 15 minutes (up to 4 units per day), a half day (1.25 to 4 hours per day), a full day (4.25 to 8 hours per day) or an extended day (8.25 to 12 hours per day). Adult day services have an upper limit if there is no Veterans Administration contract. The upper limits are published in the Iowa Administrative Code and are subject to change on a yearly basis.

\*When Adult Day Care services are provided to a person within their home, the unit of service is a 15-minute unit and the reimbursement rate is the Adult Day Care provider's Adult Day Care rate for the 15-minute unit of service or the provider's Specialized Respite rate not to exceed the current upper limit for Specialized Respite at the time the service is delivered, whichever applies.

The person's case manager is responsible for oversight to avoid duplication of services and to assure state plan services are appropriately authorized in the person's person-centered service plan as needed. Where there is a potential for overlap, services must first be exhausted under Section 110 of the Rehabilitation Act of 1973. The first line of prevention of duplicative billing for similar types of services, such as family and community support service, is the person's case manager. The case manager is responsible for the authorization and monitoring of services in a person's service plan. If the case manager authorizes similar services, they are responsible for ensuring that the services are delivered as described in the person-centered service plan.

Adult day care and respite are separate and distinct services. Adult Day care can be provided while the primary care giver(s) are working whereas respite is intended to give the primary care giver a break from care and may not be provided while the primary care giver(s) is working. Adult day care service cannot be authorized to be provided at the same time."

Persons enrolled in the waiver have access to Iowa's Waiver of Administrative Rules (WoAR) option. WoARs can be requested but cannot be requested for Federal requirements or state law. Persons needing additional services to ensure health, safety, or other issues can request WoARs. The request must substantiate the exceptional need and also address why no other Medicaid or waiver service can address the issue. Decisions regarding WoAR requests are approved by the Department of Health and Human Services director.

These services are limited to additional services not otherwise covered under the state plan, but consistent with waiver objectives of avoiding institutionalization.

**Service Delivery Method** (*check each that applies*):

☒ Participant-directed as specified in Appendix E

- ☒ **Provider managed**
- ☐ **Remote/via Telehealth**

Specify whether the service may be provided by (check each that applies):

- ☐ **Legally Responsible Person**
- ☒ **Relative**
- ☐ **Legal Guardian**

**Provider Specifications:**

Provider Category	Provider Type Title
Agency	Agencies certified by the department to provide respite services in the member's home that meet the requirements of 77.37(1) and 77.37(3) through 77.37(9)
Agency	Home Health Agency certified to provide Respite
Agency	Specialized Respite Care providers certified under the BI or ID waivers
Agency	Supported Community Living providers certified under the BI or ID Waivers to provide Respite
Agency	Home Care Agency certified to provide Respite
Agency	Adult Day Care Agencies

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Statutory Service**

**Service Name: Adult Day Care**

**Provider Category:**

Agency

**Provider Type:**

Agencies certified by the department to provide respite services in the member's home that meet the requirements of 77.37(1) and 77.37(3) through 77.37(9)

**Provider Qualifications**

**License (specify):**

**Certificate (specify):**

Certified to provide Respite by the Department's Home and Community Based Services Quality Oversight Unit as outlined in Iowa Administrative Code 441 Chapter 77 and the HCBS Waiver Provider Manual

**Other Standard (specify):**

(Providers must be:

- (1) At least 18 years of age.
- (2) Qualified by training as required by the DIA, the ADC licensing entity.
- (3) Not the spouse or guardian of the person or a parent or stepparent of a person aged 17 or under.
- (4) Not the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based service.

The adult day care service agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision

**Verification of Provider Qualifications**

**Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every five years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Statutory Service**

**Service Name: Adult Day Care**

**Provider Category:**

Agency

**Provider Type:**

Home Health Agency certified to provide Respite

**Provider Qualifications**

**License (specify):**

**Certificate (specify):**

Home health agencies certified to participate in the Medicare program (Title XVII of the Social Security Act sections 1861(o) and 1891), and, unless exempted under Iowa Administrative Code, have submitted a surety bond.

**Other Standard (specify):**

Providers must be:

- (1) At least 18 years of age.
- (2) Qualified by training as required by the DIAL, the ADC licensing entity.
- (3) Not the spouse or guardian of the person or a parent or stepparent of a person aged 17 or under.
- (4) Not the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based service.

The adult day care service agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

**Verification of Provider Qualifications**

**Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every five years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Statutory Service**

**Service Name: Adult Day Care**

**Provider Category:**

Agency

**Provider Type:**

Specialized Respite Care providers certified under the BI or ID waivers

**Provider Qualifications**

**License (specify):**

**Certificate (specify):**

Certified to provide Specialized Respite by the Department's Home and Community Based Services Quality Oversight Unit as outlined in Iowa Administrative Code 441 Chapter 77 and the HCBS Waiver Provider Manual.

**Other Standard (specify):**

Providers must be:

- (1) At least 18 years of age.
  - (2) Qualified by training as required by the DIA, the ADC licensing entity.
  - (3) Not the spouse or guardian of the person or a parent or stepparent of a person aged 17 or under.
  - (4) Not the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based service.
- The adult day care service agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every five years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service****Service Type: Statutory Service****Service Name: Adult Day Care****Provider Category:**

Agency

**Provider Type:**

Supported Community Living providers certified under the BI or ID Waivers to provide Respite

**Provider Qualifications****License (specify):****Certificate (specify):**

Providers certified by the Department's Home and Community Based Services Quality Oversight Unit to provide Supported Community Living under the Intellectual Disability or Brain Injury Waiver as described in IAC 441 Chapters 77.37 and 77.39 and the HCBS Waiver Provider Manual.

**Other Standard (specify):**

Providers must be:

- (1) At least 18 years of age.
- (2) Qualified by training as required by the DIA, the ADC licensing entity.
- (3) Not the spouse or guardian of the person or a parent or stepparent of a person aged 17 or under.
- (4) Not the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based service.

The adult day care service agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every five years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service**

**Service Type: Statutory Service****Service Name: Adult Day Care****Provider Category:**

Agency

**Provider Type:**

Home Care Agency certified to provide Respite

**Provider Qualifications****License (specify):****Certificate (specify):**

Eligible Home care agencies are those that meet the conditions set forth in Iowa Administrative Code 441--77.33(4). a. Certified as a home health agency under Medicare, or b. Authorized to provide similar services through a contract with the department of public health (IDPH) for local public health services. The agency must provide a current IDPH local public health services contract number. (at this time, the IDPH is no longer contracting for homemaker services.)

**Other Standard (specify):**

Providers must be:

- (1) At least 18 years of age.
- (2) Qualified by training as required by the DIA, the ADC licensing entity.
- (3) Not the spouse or guardian of the person or a parent or stepparent of a person aged 17 or under.
- (4) Not the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based service.

The adult day service agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every five years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service****Service Type: Statutory Service****Service Name: Adult Day Care****Provider Category:**

Agency

**Provider Type:**

Adult Day Care Agencies

**Provider Qualifications****License (specify):****Certificate (specify):**

Meeting the requirements of Iowa administrative Code 441.77, 441.78, HCBS Waiver Provider Manual and certified by the Iowa Department of Inspections and Appeals as being in compliance with the standards for adult day services under Iowa Administrative Code 481.70.

**Other Standard (specify):**

Providers must be:

- (1) At least 18 years of age.

- (2) Qualified by training as required by the DIA, the ADC licensing entity.
- (3) Not the spouse or guardian of the member or a parent or stepparent of a member aged 17 or under.
- (4) Not the recipient of respite services paid through home- and community-based services on behalf of a member who receives home- and community-based service.

The adult day service agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

The Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every five years

## Appendix C: Participant Services

### C-1/C-3: Service Specification

State laws, regulations and policies referenced in the specification are readily available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

#### Service Type:

Statutory Service

#### Service:

Respite

#### Alternate Service Title (if any):

#### HCBS Taxonomy:

##### Category 1:

09 Caregiver Support

##### Sub-Category 1:

09011 respite, out-of-home

##### Category 2:

09 Caregiver Support

##### Sub-Category 2:

09012 respite, in-home

##### Category 3:

##### Sub-Category 3:

##### Category 4:

##### Sub-Category 4:

#### Service Definition (Scope):

Respite care services are services provided to the person that give temporary relief to the usual caregiver and provide all the necessary care that the usual caregiver would provide during that period. The purpose of Respite is to enable the person to remain in their current living situation. Staff to person ratios shall be appropriate to the person's needs as determined by the person's interdisciplinary team.

“Usual caregiver” means an unpaid person or persons who reside with the member and are available on a 24-hour- per-day basis to assume responsibility for the care of the member. Usual and primary caregiver are used interchangeably. It means an unpaid person or persons who reside with the member and are available on a 24-hour- per-day basis to assume responsibility for the care of the member. If the person lives in the home and is a paid caregiver, then they do not meet the definition of usual or primary caregiver.

The interdisciplinary team shall determine if the person shall receive Basic Individual Respite, Specialized Respite or Group Respite, and shall approve the setting in which respite is provided. The state of Iowa allows respite services to be provided in a variety of community-based settings and by different provider types. Respite may be provided in the home, in a camp setting, in a community-based setting commensurate with how the setting is used by general public, and licensed facilities when the participant requires specialized Respite care.

All Respite services identified in Appendix J fall within the definition of Basic, Specialized or Group Respite.

- Basic Individual Respite means Respite provided on a staff-to-person ratio of one to one to persons without specialized needs requiring the care of a licensed registered nurse or licensed practical nurse.

- Group Respite means Respite provided on a staff to person ratio of less than one to one.

- Specialized Respite means Respite provided on a staff to person ratio of one to one to persons with specialized medical needs requiring the care, monitoring or supervision of a licensed registered nurse or licensed practical nurse.

When transportation is provided as a component of the Respite service the cost of transportation is included with the Respite reimbursement rate.

The person-centered service plan will address how the person's needs are met. Services must be authorized in the person-centered service plan and monitored by the case manager.

**Specify applicable (if any) limits on the amount, frequency, or duration of this service:**

A unit of service is a 15-minute unit.

A maximum of 14 consecutive days of 24-hour respite care may be reimbursed. Respite services provided for a period exceeding 24 consecutive hours to three or more individuals who require nursing care because of a mental or physical condition must be provided by a health care facility licensed as described in Iowa Code Chapter 135C.

Services provided outside the person’s home, such as a licensed facility, shall not be reimbursable if the living unit where the respite is provided is reserved for another person on a temporary leave of absence. Respite may be provided in facilities (Intermediate Care Facilities for persons with Intellectual Disabilities (ICF/ID), residential care facilities for persons with Intellectual Disabilities (RCF/ID), etc.). To avoid the duplication of payment between Medicaid and the facility, facilities are paid for reserved bed days as part of the facility per diem payment rate.

Facilities are paid for days when the person is out of the facility for hospitalization, home visits, vacations, etc. Waiver funds cannot be used to pay for a person to stay in the facility in a bed that is paid for as a reserved bed day.

Respite services are not to be provided to people during the hours in which the usual caregiver is employed except when the person is attending a 24-hour residential camp.

When the person elects to use Consumer Choice Option (CCO), the amount, frequency, or duration of the self- directed respite service is the same as respite that is not self-directed.

Federal financial participation is not claimed for the cost of room and board except when provided as part of respite care provided outside of the person's home. This may include ICF/ID, RCF/ID, licensed foster care homes, Camps accredited by the American Camping Association, and hotels and motels. Hotels and motels are used based on individual need. Federal financial participation is included within the rate paid to the respite provider.

Respite services shall not be simultaneously reimbursed with other residential or respite services, HCBS waiver Supported Community Living services, Medicaid or HCBS waiver nursing, or Medicaid or HCBS Home Health Aide services. In addition, where there is a potential for overlap, services must first be exhausted under Section 110 of the Rehabilitation Act of 1973.

The first line of prevention of duplicative billing for similar types of services is the person's case manager. The case manager is responsible for the authorization and monitoring of services in a person’s service plan. If the case manager authorizes similar services, they are responsible for ensuring that the services are delivered as ordered.

Persons enrolled in the waiver have access to Iowa’s Waiver of Administrative Rules (WoAR) option. WoARs can be requested but cannot be requested for Federal requirements or state law. Persons needing additional services to ensure

health, safety, or other issues can request WoARs. The request must substantiate the exceptional need and also address why no other Medicaid or waiver service can address the issue. Decisions regarding WoAR requests are approved by the Department of Health and Human Services director

**Service Delivery Method** (*check each that applies*):

- ☒ Participant-directed as specified in Appendix E
- ☒ Provider managed
- ☐ Remote/via Telehealth

**Specify whether the service may be provided by** (*check each that applies*):

- ☐ Legally Responsible Person
- ☒ Relative
- ☐ Legal Guardian

**Provider Specifications:**

Provider Category	Provider Type Title
Agency	Home health agencies
Agency	Assisted living programs
Agency	Home Care Agency
Agency	Camps
Agency	Adult Day Care providers
Agency	Childcare Facility
Individual	Residential Care Facility
Agency	Foster Care Facility
Agency	Respite care providers certified under the Intellectual Disability or Brain Injury Waivers.
Agency	Nursing facilities, intermediate care facilities for the intellectually disabled, or hospitals

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Statutory Service**

**Service Name: Respite**

**Provider Category:**

Agency

**Provider Type:**

Home health agencies

**Provider Qualifications**

**License** (*specify*):

**Certificate** (*specify*):

Home health agencies certified to participate in the Medicare program (Title XVII of the Social Security Act sections 1861(o) and 1891), and, unless exempted under Iowa Administrative Code, have submitted a surety bond.

**Other Standard** (*specify*):

Providers must:

- (1) Be at least 18 years of age.
- (2) Be qualified by training in accordance with the Iowa Administrative Code to carry out the person's service plan pursuant to department-approved service planning process.
- (3) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that



criminal background and abuse registry checks are conducted prior to direct service provision.

(4) Not be the spouse or guardian of the person or a parent or stepparent of a person aged 17 or under.

(5) Not be the recipient of respite services paid through home and community-based services on behalf of the person who receives home and community-based services.

Respite providers shall meet the following conditions:

(1) Providers shall maintain the following information that shall be updated at least annually: -The person's name, birth date, age, address and the telephone number of the spouse, guardian, or primary caregiver. -An emergency medical care release. -Emergency contact telephone numbers such as the number of the person's physician and the spouse, guardian, or primary caregiver. -The person's medical issues, including allergies. -The person's daily schedule which includes the person's preferences in activities or foods or any other special concerns.

(2) Procedures shall be developed for the dispensing, storage, authorization, and recording of all prescription and nonprescription medications administered. Home health agencies must follow Medicare regulations for medication dispensing. All medications shall be stored in their original containers, with the accompanying physician's or pharmacist's directions and label intact. Medications shall be stored so they are inaccessible to members and the public. Nonprescription medications shall be labeled with the person's name. In the case of medications that are administered on an ongoing, long-term basis, authorization shall be obtained for a period not to exceed the duration of the prescription.

(3) Policies shall be developed for: -Notifying the spouse, guardian, or primary caregiver of any injuries or illnesses that occur during respite provision. A spouse's, guardian's or primary caregiver's signature is required to verify receipt of notification. -Requiring the spouse, guardian, or primary caregiver to notify the respite provider of any injuries or illnesses that occurred prior to respite provision. -

(4) Documenting activities and times of respite. This documentation shall be made available to the spouse, guardian, or primary caregiver upon request. -

(5) Ensuring the safety and privacy of the person. Policies shall at a minimum address threat of fire, tornado, or flood and bomb threats.

(6) A facility providing respite shall not exceed the facility's licensed capacity, and services shall be provided in locations consistent with licensure.

Respite provided outside the person's home, or the facility covered by the licensure, certification, accreditation, or contract must be approved by the spouse, guardian or primary caregiver and the interdisciplinary team and must be consistent with the way the location is used by the general public. Respite in these locations shall not exceed 72 continuous hours

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every five years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Statutory Service**

**Service Name: Respite**

#### Provider Category:

Agency

#### Provider Type:

Assisted living programs

#### Provider Qualifications

**License (specify):**

**Certificate (specify):**

Assisted Living programs certified by the Department of Inspections and Appeals as defined in IAC 481.

**Other Standard (specify):**

Providers must:

- (1) Be at least 18 years of age.
- (2) Be qualified by training in accordance with the Iowa Administrative Code to carry out the person's service plan pursuant to department-approved service planning process.
- (3) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.
- (5) Not be the recipient of Respite services paid through home and community-based services on behalf of the person who receives home and community-based services.

Respite providers shall meet the following conditions:

- (1) Providers shall maintain the following information that shall be updated at least annually: -The person's name, birth date, age, address and the telephone number of the spouse, guardian, or primary caregiver. -An emergency medical care release. -Emergency contact telephone numbers such as the number of the person's physician and the spouse, guardian, or primary caregiver. -The person's medical issues, including allergies. -The person's daily schedule which includes the person's preferences in activities or foods or any other special concerns.
  - (2) Procedures shall be developed for the dispensing, storage, authorization, and recording of all prescription and nonprescription medications administered. Home health agencies must follow Medicare regulations for medication dispensing. All medications shall be stored in their original containers, with the accompanying physician's or pharmacist's directions and label intact. Medications shall be stored so they are inaccessible to members and the public. Nonprescription medications shall be labeled with the person's name. In the case of medications that are administered on an ongoing, long-term basis, authorization shall be obtained for a period not to exceed the duration of the prescription.
  - (3) Policies shall be developed for: -Notifying the spouse, guardian, or primary caregiver of any injuries or illnesses that occur during Respite provision. A spouse's, guardian's or primary caregiver's signature is required to verify receipt of notification. -Requiring the spouse, guardian, or primary caregiver to notify the Respite provider of any injuries or illnesses that occurred prior to Respite provision. -
  - (4) Documenting activities and times of Respite. This documentation shall be made available to the spouse, guardian, or primary caregiver upon request.
  - (5) Ensuring the safety and privacy of the person. Policies shall at a minimum address threat of fire, tornado, or flood and bomb threats.
  - (6) A facility providing Respite shall not exceed the facility's licensed capacity, and services shall be provided in locations consistent with licensure.
- Respite provided outside the person's home, or the facility covered by the licensure, certification, accreditation, or contract must be approved by the spouse, guardian or primary caregiver and the interdisciplinary team and must be consistent with the way the location is used by the general public. Respite in these locations shall not exceed 72 continuous hours.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Statutory Service**

**Service Name: Respite**

#### Provider Category:

Agency

#### Provider Type:

Home Care Agency

#### Provider Qualifications

**License (specify):**

**Certificate (specify):**

Eligible home care agencies are those that meet the conditions set forth in Iowa Administrative Code 441--77.33(4).

- a. Certified as a home health agency under Medicare, or
- b. Authorized to provide similar services through a contract with HHS for local public health services. The agency must provide a current local public health services contract number.

**Other Standard (specify):**

Providers must:

- (1) Be at least 18 years of age.
- (2) Be qualified by training in accordance with the Iowa Administrative Code to carry out the person's service plan pursuant to department-approved service planning process.
- (3) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.
- (4) Not be the recipient of Respite services paid through home and community-based services on behalf of the person who receives home and community-based services.

Respite providers shall meet the following conditions:

- (1) Providers shall maintain the following information that shall be updated at least annually: -The person's name, birth date, age, address and the telephone number of the spouse, guardian, or primary caregiver. -An emergency medical care release. -Emergency contact telephone numbers such as the number of the person's physician and the spouse, guardian, or primary caregiver. -The person's medical issues, including allergies. -The person's daily schedule which includes the person's preferences in activities or foods or any other special concerns.
- (2) Procedures shall be developed for the dispensing, storage, authorization, and recording of all prescription and nonprescription medications administered. Home health agencies must follow Medicare regulations for medication dispensing. All medications shall be stored in their original containers, with the accompanying physician's or pharmacist's directions and label intact. Medications shall be stored so they are inaccessible to members and the public. Nonprescription medications shall be labeled with the person's name. In the case of medications that are administered on an ongoing, long-term basis, authorization shall be obtained for a period not to exceed the duration of the prescription.
- (3) Policies shall be developed for: -Notifying the spouse, guardian, or primary caregiver of any injuries or illnesses that occur during Respite provision. A spouse's, guardian's or primary caregiver's signature is required to verify receipt of notification. -Requiring the spouse, guardian, or primary caregiver to notify the Respite provider of any injuries or illnesses that occurred prior to Respite provision. -
- (4) Documenting activities and times of Respite. This documentation shall be made available to the spouse, guardian, or primary caregiver upon request.
- (5) Ensuring the safety and privacy of the person. Policies shall at a minimum address threat of fire, tornado, or flood and bomb threats.
- (6) A facility providing Respite shall not exceed the facility's licensed capacity, and services shall be provided in locations consistent with licensure.

Respite provided outside the person's home, or the facility covered by the licensure, certification, accreditation, or contract must be approved by the spouse, guardian or primary caregiver and the interdisciplinary team and must be consistent with the way the location is used by the general public. Respite in these locations shall not exceed 72 continuous hours.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service**

**Service Type: Statutory Service**

**Service Name: Respite**

**Provider Category:**

Agency

**Provider Type:**

Camps

**Provider Qualifications****License (specify):****Certificate (specify):**

Respite care providers certified in accordance with Iowa Administrative Code 441-77.33(6). Camps certified by the American Camping Association. The ACA-Accreditation Program:

- Educates camp owners and directors in the administration of key aspects of camp operation, program quality, and the health and safety of campers and staff.
- Establishes guidelines for needed policies, procedures, and practices for which the camp is responsible for ongoing implementation.
- Assists the public in selecting camps that meet industry-accepted and government recognized standards.

ACA's Find a Camp database provides the public with many ways to find the ideal ACA-accredited camp. Mandatory standards include requirements for staff screening, emergency exits, first aid, aquatic- certified personnel, storage and use of flammables and firearms, emergency transportation, obtaining appropriate health information, among others. Can visit [www.ACAcamps.org/accreditation](http://www.ACAcamps.org/accreditation) for more information.

**Other Standard (specify):**

RProviders must:

- (1) Be at least 18 years of age.
- (2) Be qualified by training in accordance with the Iowa Administrative Code to carry out the person's service plan pursuant to department-approved service planning process.
- (3) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.
- (4)
- (5) Not be the recipient of respite services paid through home and community-based services on behalf of the person who receives home and community-based services.

Respite providers shall meet the following conditions:

- (1) Providers shall maintain the following information that shall be updated at least annually: -The person's name, birth date, age, address and the telephone number of the spouse, guardian, or primary caregiver. -An emergency medical care release. -Emergency contact telephone numbers such as the number of the person's physician and the spouse, guardian, or primary caregiver. -The person's medical issues, including allergies. -The person's daily schedule which includes the person's preferences in activities or foods or any other special concerns.
- (2) Procedures shall be developed for the dispensing, storage, authorization, and recording of all prescription and nonprescription medications administered. Home health agencies must follow Medicare regulations for medication dispensing. All medications shall be stored in their original containers, with the accompanying physician's or pharmacist's directions and label intact. Medications shall be stored so they are inaccessible to members and the public. Nonprescription medications shall be labeled with the person's name. In the case of medications that are administered on an ongoing, long-term basis, authorization shall be obtained for a period not to exceed the duration of the prescription.
- (3) Policies shall be developed for: -Notifying the spouse, guardian, or primary caregiver of any injuries or illnesses that occur during respite provision. A spouse's, guardian's or primary caregiver's signature is required to verify receipt of notification. -Requiring the spouse, guardian, or primary caregiver to notify the respite provider of any injuries or illnesses that occurred prior to respite provision. -
- (4) Documenting activities and times of respite. This documentation shall be made available to the spouse, guardian, or primary caregiver upon request. -
- (5) Ensuring the safety and privacy of the person. Policies shall at a minimum address threat of fire, tornado, or flood and bomb threats.
- (6) A facility providing respite shall not exceed the facility's licensed capacity, and services shall be provided in locations consistent with licensure.

Respite provided outside the person's home, or the facility covered by the licensure, certification, accreditation, or contract must be approved by the spouse, guardian or primary caregiver and the interdisciplinary team and must be consistent with the way the location is used by the general public. Respite in these locations shall not exceed 72 continuous hours.

**Verification of Provider Qualifications**

08/15/2025

**Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service****Service Type: Statutory Service****Service Name: Respite****Provider Category:**

Agency

**Provider Type:**

Adult Day Care providers

**Provider Qualifications****License (specify):****Certificate (specify):**

Adult Day Care Providers certified by the Iowa Department of Inspections and Appeals under Iowa Administrative Code 481.

**Other Standard (specify):**

Respite providers shall meet the following conditions:

Providers must:

- (1) Be at least 18 years of age.
- (2) Be qualified by training in accordance with the Iowa Administrative Code to carry out the person's service plan pursuant to department-approved service planning process.
- (3) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.
- (4) Not be the recipient of Respite services paid through home and community-based services on behalf of the person who receives home and community-based services.

Respite providers shall meet the following conditions:

- (1) Providers shall maintain the following information that shall be updated at least annually: -The person's name, birth date, age, address and the telephone number of the spouse, guardian, or primary caregiver. -An emergency medical care release. -Emergency contact telephone numbers such as the number of the person's physician and the spouse, guardian, or primary caregiver. -The person's medical issues, including allergies. -The person's daily schedule which includes the person's preferences in activities or foods or any other special concerns.
- (2) Procedures shall be developed for the dispensing, storage, authorization, and recording of all prescription and nonprescription medications administered. Home health agencies must follow Medicare regulations for medication dispensing. All medications shall be stored in their original containers, with the accompanying physician's or pharmacist's directions and label intact. Medications shall be stored so they are inaccessible to members and the public. Nonprescription medications shall be labeled with the person's name. In the case of medications that are administered on an ongoing, long-term basis, authorization shall be obtained for a period not to exceed the duration of the prescription.
- (3) Policies shall be developed for: -Notifying the spouse, guardian, or primary caregiver of any injuries or illnesses that occur during respite provision. A spouse's, guardian's or primary caregiver's signature is required to verify receipt of notification. -Requiring the spouse, guardian, or primary caregiver to notify the respite provider of any injuries or illnesses that occurred prior to respite provision.
- (4) Documenting activities and times of respite. This documentation shall be made available to the spouse, guardian, or primary caregiver upon request.
- (5) Ensuring the safety and privacy of the person. Policies shall at a minimum address threat of fire, tornado, or flood and bomb threats.

(6) A facility providing respite shall not exceed the facility's licensed capacity, and services shall be provided in locations consistent with licensure.

Respite provided outside the person's home, or the facility covered by the licensure, certification, accreditation, or contract must be approved by the spouse, guardian or primary caregiver and the interdisciplinary team and must be consistent with the way the location is used by the general public. Respite in these locations shall not exceed 72 continuous hours.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type:** Statutory Service

**Service Name:** Respite

#### Provider Category:

Agency

#### Provider Type:

Childcare Facility

#### Provider Qualifications

##### License (specify):

Childcare facilities, which are defined as childcare centers, preschools, or child development homes registered pursuant to IAC 441.

##### Certificate (specify):

##### Other Standard (specify):

Providers must:

- (1) Be at least 18 years of age.
- (2) Be qualified by training in accordance with the Iowa Administrative Code to carry out the person's service plan pursuant to department-approved service planning process.
- (3) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.
- (5) Not be the recipient of respite services paid through home and community-based services on behalf of the person who receives home and community-based services.

Respite providers shall meet the following conditions:

- (1) Providers shall maintain the following information that shall be updated at least annually: -The person's name, birth date, age, address and the telephone number of the spouse, guardian, or primary caregiver. -An emergency medical care release. -Emergency contact telephone numbers such as the number of the person's physician and the spouse, guardian, or primary caregiver. -The person's medical issues, including allergies. -The person's daily schedule which includes the person's preferences in activities or foods or any other special concerns.
- (2) Procedures shall be developed for the dispensing, storage, authorization, and recording of all prescription and nonprescription medications administered. Home health agencies must follow Medicare regulations for medication dispensing. All medications shall be stored in their original containers, with the accompanying physician's or pharmacist's directions and label intact. Medications shall be stored so they are inaccessible to members and the public. Nonprescription medications shall be labeled with the person's name. In the case of medications that are administered on an ongoing, long-term basis, authorization shall be obtained for a period not to exceed the duration of the prescription.
- (3) Policies shall be developed for: -Notifying the spouse, guardian, or primary caregiver of any injuries or illnesses that occur during respite provision. A spouse's, guardian's or primary caregiver's signature is required to verify receipt of notification. -Requiring the spouse, guardian, or primary caregiver to notify the respite provider of any injuries or illnesses

that occurred prior to respite provision. –

(4) Documenting activities and times of respite. This documentation shall be made available to the spouse, guardian, or primary caregiver upon request.

(5) Ensuring the safety and privacy of the person. Policies shall at a minimum address threat of fire, tornado, or flood and bomb threats.

(6) A facility providing respite shall not exceed the facility's licensed capacity, and services shall be provided in locations consistent with licensure.

Respite provided outside the person's home, or the facility covered by the licensure, certification, accreditation, or contract must be approved by the spouse, guardian or primary caregiver and the interdisciplinary team and must be consistent with the way the location is used by the general public. Respite in these locations shall not exceed 72 continuous hours.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Statutory Service**

**Service Name: Respite**

#### Provider Category:

Individual

#### Provider Type:

Residential Care Facility

#### Provider Qualifications

##### License (specify):

Residential care facilities licensed and in good standing by the Department of Inspections and Appeals under Iowa Administrative Code 481.

##### Certificate (specify):

##### Other Standard (specify):

Providers must:

- (1) Be at least 18 years of age.
- (2) Be qualified by training in accordance with the Iowa Administrative Code to carry out the person's service plan pursuant to department-approved service planning process.
- (3) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.
- (4) Not be the recipient of Respite services paid through home and community-based services on behalf of the person who receives home and community-based services.
- (5) Not be the recipient of Respite services paid through home and community-based services on behalf of the person who receives home and community-based services.

Respite providers shall meet the following conditions:

- (1) Providers shall maintain the following information that shall be updated at least annually: -The person's name, birth date, age, address and the telephone number of the spouse, guardian, or primary caregiver. -An emergency medical care release. -Emergency contact telephone numbers such as the number of the person's physician and the spouse, guardian, or primary caregiver. -The person's medical issues, including allergies. -The person's daily schedule which includes the person's preferences in activities or foods or any other special concerns.
- (2) Procedures shall be developed for the dispensing, storage, authorization, and recording of all prescription and nonprescription medications administered. Home health agencies must follow Medicare regulations for medication dispensing. All medications shall be stored in their original containers, with the accompanying physician's or pharmacist's

directions and label intact. Medications shall be stored so they are inaccessible to members and the public. Nonprescription medications shall be labeled with the person's name. In the case of medications that are administered on an ongoing, long-term basis, authorization shall be obtained for a period not to exceed the duration of the prescription.

(3) Policies shall be developed for: -Notifying the spouse, guardian, or primary caregiver of any injuries or illnesses that occur during Respite provision. A spouse's, guardian's or primary caregiver's signature is required to verify receipt of notification. -Requiring the spouse, guardian, or primary caregiver to notify the Respite provider of any injuries or illnesses that occurred prior to Respite provision. –

(4) Documenting activities and times of Respite. This documentation shall be made available to the spouse, guardian, or primary caregiver upon request.

(5) Ensuring the safety and privacy of the person. Policies shall at a minimum address threat of fire, tornado, or flood and bomb threats.

(6) A facility providing Respite shall not exceed the facility's licensed capacity, and services shall be provided in locations consistent with licensure.

Respite provided outside the person's home, or the facility covered by the licensure, certification, accreditation, or contract must be approved by the spouse, guardian or primary caregiver and the interdisciplinary team and must be consistent with the way the location is used by the general public. Respite in these locations shall not exceed 72 continuous hours.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit.

##### Frequency of Verification:

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Statutory Service**

**Service Name: Respite**

#### Provider Category:

Agency

#### Provider Type:

Foster Care Facility

#### Provider Qualifications

##### License (specify):

Group foster care facilities for children licensed and in good standing by the department according to Iowa Administrative Code 441.

##### Certificate (specify):

##### Other Standard (specify):

Providers must:

- (1) Be at least 18 years of age.
- (2) Be qualified by training in accordance with the Iowa Administrative Code to carry out the person's service plan pursuant to department-approved service planning process.
- (3) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.
- (4) Not be the recipient of Respite services paid through home and community-based services on behalf of the person who receives home and community-based services.

Respite providers shall meet the following conditions:

- (1) Providers shall maintain the following information that shall be updated at least annually: -The person's name, birth date, age, address and the telephone number of the spouse, guardian, or primary caregiver. -An emergency medical care release. -Emergency contact telephone numbers such as the number of the person's physician and the spouse, guardian, or



primary caregiver. -The person's medical issues, including allergies. -The person's daily schedule which includes the person's preferences in activities or foods or any other special concerns.

(2) Procedures shall be developed for the dispensing, storage, authorization, and recording of all prescription and nonprescription medications administered. Home health agencies must follow Medicare regulations for medication dispensing. All medications shall be stored in their original containers, with the accompanying physician's or pharmacist's directions and label intact. Medications shall be stored so they are inaccessible to members and the public. Nonprescription medications shall be labeled with the person's name. In the case of medications that are administered on an ongoing, long-term basis, authorization shall be obtained for a period not to exceed the duration of the prescription.

(3) Policies shall be developed for: -Notifying the spouse, guardian, or primary caregiver of any injuries or illnesses that occur during Respite provision. A spouse's, guardian's or primary caregiver's signature is required to verify receipt of notification. -Requiring the spouse, guardian, or primary caregiver to notify the Respite provider of any injuries or illnesses that occurred prior to Respite provision. –

(4) Documenting activities and times of Respite. This documentation shall be made available to the spouse, guardian, or primary caregiver upon request.

(5) Ensuring the safety and privacy of the person. Policies shall at a minimum address threat of fire, tornado, or flood and bomb threats.

(6) A facility providing Respite shall not exceed the facility's licensed capacity, and services shall be provided in locations consistent with licensure.

Respite provided outside the person's home, or the facility covered by the licensure, certification, accreditation, or contract must be approved by the spouse, guardian or primary caregiver and the interdisciplinary team and must be consistent with the way the location is used by the general public. Respite in these locations shall not exceed 72 continuous hours.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Statutory Service**

**Service Name: Respite**

#### Provider Category:

Agency

#### Provider Type:

Respite care providers certified under the Intellectual Disability or Brain Injury Waivers.

#### Provider Qualifications

##### License (specify):

##### Certificate (specify):

Certified to provide respite by the Department's Home and Community Based Services Quality Oversight Unit as outlined in Iowa Administrative Code 441.

##### Other Standard (specify):

Providers must:

- (1) Be at least 18 years of age.
- (2) Be qualified by training in accordance with the Iowa Administrative Code to carry out the person's service plan pursuant to department-approved service planning process.
- (3) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.
- (4) Not be the recipient of respite services paid through home and community-based services on behalf of the person who receives home and community-based services.

Respite providers shall meet the following conditions:

- (1) Providers shall maintain the following information that shall be updated at least annually: -The person's name, birth date, age, address and the telephone number of the spouse, guardian, or primary caregiver. -An emergency medical care release. -Emergency contact telephone numbers such as the number of the person's physician and the spouse, guardian, or primary caregiver. -The person's medical issues, including allergies. -The person's daily schedule which includes the person's preferences in activities or foods or any other special concerns.
- (2) Procedures shall be developed for the dispensing, storage, authorization, and recording of all prescription and nonprescription medications administered. Home health agencies must follow Medicare regulations for medication dispensing. All medications shall be stored in their original containers, with the accompanying physician's or pharmacist's directions and label intact. Medications shall be stored so they are inaccessible to members and the public. Nonprescription medications shall be labeled with the person's name. In the case of medications that are administered on an ongoing, long-term basis, authorization shall be obtained for a period not to exceed the duration of the prescription.
- (3) Policies shall be developed for: -Notifying the spouse, guardian, or primary caregiver of any injuries or illnesses that occur during respite provision. A spouse's, guardian's or primary caregiver's signature is required to verify receipt of notification. -Requiring the spouse, guardian, or primary caregiver to notify the respite provider of any injuries or illnesses that occurred prior to respite provision. –
- (4) Documenting activities and times of respite. This documentation shall be made available to the spouse, guardian, or primary caregiver upon request. –
- (5) Ensuring the safety and privacy of the person. Policies shall at a minimum address threat of fire, tornado, or flood and bomb threats.
- (6) A facility providing respite shall not exceed the facility's licensed capacity, and services shall be provided in locations consistent with licensure.

Respite provided outside the person's home, or the facility covered by the licensure, certification, accreditation, or contract must be approved by the spouse, guardian or primary caregiver and the interdisciplinary team and must be consistent with the way the location is used by the general public. Respite in these locations shall not exceed 72 continuous hours.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Statutory Service**

**Service Name: Respite**

#### Provider Category:

Agency

#### Provider Type:

Nursing facilities, intermediate care facilities for the intellectually disabled, or hospitals

#### Provider Qualifications

##### License (specify):

Nursing facilities, intermediate care facilities for the people with intellectual disabilities, and hospitals enrolled as providers in the Iowa Medicaid program. Community businesses that have all necessary licenses and permits to operate in conformity with federal, state, and local laws and regulations, including Iowa Code Chapter 490, and that submit verification of current liability and workers' compensation insurance.

Licensed by the Department of Inspections and Appeals under Iowa Administrative Code 481.

- Nursing facilities defined in Iowa Administrative Code 441: "Facility" means a licensed nursing facility certified in accordance with the provisions of 42 CFR Part 483, as amended to September 23, 1992, to provide health services and includes hospital-based nursing facilities that are Medicare-certified and provide only skilled level of care and swing-bed hospitals unless stated otherwise.

- Hospitals enrolled as providers in the Iowa Medicaid program as defined in Iowa Administrative Code 441. All hospitals licensed in the state of Iowa or in another state and certified as eligible to participate in Part A of the Medicare program (Title XVIII of the Social Security Act) are eligible to participate in the medical assistance program.
- Intermediate care facilities for people with intellectual disabilities licensed by the Department of Inspection and Appeal under Iowa Administrative Code 441. Iowa Code 135C defines intermediate care facility for persons with an intellectual disability as "an institution or distinct part of an institution with a primary purpose to provide health or rehabilitative services to three or more individuals, who primarily have an intellectual disability or a related condition and who are not related to the administrator or owner within the third degree of consanguinity, and which meets the requirements of this chapter and federal standards for intermediate care facilities for persons with an intellectual disability established pursuant to the federal Social Security Act, §1905(c)(d), as codified in 42 U.S.C. §1396d, which are contained in 42 C.F.R. pt. 483, subpt. D, §410 – 480.

**Certificate** (*specify*):

Nursing facilities, intermediate care facilities for the people with intellectual disabilities, and hospitals enrolled as providers in the Iowa Medicaid program. Community businesses that have all necessary licenses and permits to operate in conformity with federal, state, and local laws and regulations, including Iowa Code Chapter 490, and that submit verification of current liability and workers' compensation insurance.

Licensed by the Department of Inspections and Appeals under Iowa Administrative Code 481.

- Nursing facilities defined in Iowa Administrative Code 441: "Facility" means a licensed nursing facility certified in accordance with the provisions of 42 CFR Part 483, as amended to September 23, 1992, to provide health services and includes hospital-based nursing facilities that are Medicare-certified and provide only skilled level of care and swing-bed hospitals unless stated otherwise.
- Hospitals enrolled as providers in the Iowa Medicaid program as defined in Iowa Administrative Code 441. All hospitals licensed in the state of Iowa or in another state and certified as eligible to participate in Part A of the Medicare program (Title XVIII of the Social Security Act) are eligible to participate in the medical assistance program.
- Intermediate care facilities for people with intellectual disabilities licensed by the Department of Inspection and Appeal under Iowa Administrative Code 441. Iowa Code 135C defines intermediate care facility for persons with an intellectual disability as "an institution or distinct part of an institution with a primary purpose to provide health or rehabilitative services to three or more individuals, who primarily have an intellectual disability or a related condition and who are not related to the administrator or owner within the third degree of consanguinity, and which meets the requirements of this chapter and federal standards for intermediate care facilities for persons with an intellectual disability established pursuant to the federal Social Security Act, §1905(c)(d), as codified in 42 U.S.C. §1396d, which are contained in 42 C.F.R. pt. 483, subpt. D, §410 – 480.

**Other Standard** (*specify*):

Providers must:

- (1) Be at least 18 years of age.
- (2) Be qualified by training in accordance with the Iowa Administrative Code to carry out the person's service plan pursuant to department-approved service planning process.
- (3) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.
- (4)
- (5) Not be the recipient of respite services paid through home and community-based services on behalf of the person who receives home and community-based services.

Respite providers shall meet the following conditions:

- (1) Providers shall maintain the following information that shall be updated at least annually: -The person's name, birth date, age, address and the telephone number of the spouse, guardian, or primary caregiver. -An emergency medical care release. -Emergency contact telephone numbers such as the number of the person's physician and the spouse, guardian, or primary caregiver. -The person's medical issues, including allergies. -The person's daily schedule which includes the person's preferences in activities or foods or any other special concerns.
- (2) Procedures shall be developed for the dispensing, storage, authorization, and recording of all prescription and nonprescription medications administered. Home health agencies must follow Medicare regulations for medication dispensing. All medications shall be stored in their original containers, with the accompanying physician's or pharmacist's directions and label intact. Medications shall be stored so they are inaccessible to members and the public. Nonprescription medications shall be labeled with the person's name. In the case of medications that are administered on an ongoing, long-term basis, authorization shall be obtained for a period not to exceed the duration of the prescription.
- (3) Policies shall be developed for: -Notifying the spouse, guardian, or primary caregiver of any injuries or illnesses that occur during respite provision. A spouse's, guardian's or primary caregiver's signature is required to verify receipt of

notification. -Requiring the spouse, guardian, or primary caregiver to notify the respite provider of any injuries or illnesses that occurred prior to respite provision. –

(4) Documenting activities and times of respite. This documentation shall be made available to the spouse, guardian, or primary caregiver upon request.

(5) Ensuring the safety and privacy of the person. Policies shall at a minimum address threat of fire, tornado, or flood and bomb threats.

(6) A facility providing respite shall not exceed the facility's licensed capacity, and services shall be provided in locations consistent with licensure.

Respite provided outside the person's home, or the facility covered by the licensure, certification, accreditation, or contract must be approved by the spouse, guardian or primary caregiver and the interdisciplinary team and must be consistent with the way the location is used by the general public. Respite in these locations shall not exceed 72 continuous hours.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Service Specification

State laws, regulations and policies referenced in the specification are readily available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

#### Service Type:

Extended State Plan Service

#### Service Title:

Home Health Aide

#### HCBS Taxonomy:

##### Category 1:

08 Home-Based Services

##### Sub-Category 1:

08020 home health aide

##### Category 2:

##### Sub-Category 2:

##### Category 3:

##### Sub-Category 3:

##### Category 4:

##### Sub-Category 4:

#### Service Definition (Scope):

Home Health Aide services are an extension of the state plan and are personal or direct care services provided to the person in their home which are not otherwise payable under Medicaid state plan. Home Health Aide services are defined in the same manner as provided in the approved state plan. The provider qualifications specified in the state plan apply. Skilled

nursing care is not covered.

In some cases, a nurse may provide Home Health services if the health of the person is such that the agency is unable to place an aide in that situation due to limitations by state law or in the event that the agency's Medicare certification requirements prohibit the aide from providing the service. It is not permitted for the convenience of the provider.

Components of the waiver Home Health Aide service include:

- 1) Observation and reporting of physical or emotional needs.
- 2) Helping a person with bath, shampoo, or oral hygiene.
- 3) Helping a person with toileting.
- 4) Helping a person in and out of bed and with ambulation.
- 5) Helping a person reestablish activities of daily living.
- 6) Assisting with oral medications ordered by the physician which are ordinarily self-administered.
- 7) Performing incidental household services which are essential to the person's health care at home and are necessary to prevent or postpone institutionalization in order to complete a full unit of service.

The person-centered service plan will address how the person's needs are met. Services must be authorized in the person-centered service plan and monitored by the case manager.

These services are limited to additional services not otherwise covered under the state plan, but consistent with waiver objectives of avoiding institutionalization

**Specify applicable (if any) limits on the amount, frequency, or duration of this service:**

A unit of service is a visit. A visit is .25 - 2 hours. A maximum of 14 units is available per week. The rates for allowable provider types are based on the lesser of the maximum Medicare or Medicaid rates plus an established percentage increase, published in the Iowa Administrative Code, and subject to change on a yearly basis.

Home Health Aide services are provided on an intermittent basis and within the scope of Medicare Home Health Aide certification. Home Health Aide services cannot be provided outside the home.

Services shall include unskilled medical services. Instruction, supervision, support or assistance in personal hygiene, bathing, and daily living shall be provided under Supported Community Living.

Home Health services are provided under the Medicaid state plan until the limitations are reached. All state plan services must be accessed and exhausted before they are provided through the waiver. In addition, where there is a potential for overlap, services must first be exhausted under Section 110 of the Rehabilitation Act of 1973.

The person's case manager is responsible for oversight to avoid duplication of services and to assure state plan services are appropriately authorized in the person's person-centered service plan as needed. The first line of prevention of duplicative billing for similar types of services, such as Attendant Care, is the person's case manager. The case manager is responsible for the authorization and monitoring of services in a person's service plan. If the case manager authorizes similar services, they are responsible for ensuring that the services are delivered as described in the person-centered service plan.

Persons enrolled in the waiver have access to Iowa's Waiver of Administrative Rules (WoAR) option. WoARs can be requested but cannot be requested for Federal requirements or state law. Persons needing additional services to ensure health, safety, or other issues can request WoARs. The request must substantiate the exceptional need and also address why no other Medicaid or waiver service can address the issue. Decisions regarding WoAR requests are approved by the Department of Health and Human Services director.

**Service Delivery Method** (*check each that applies*):

- ☐ Participant-directed as specified in Appendix E
- ☒ Provider managed
- ☐ Remote/via Telehealth

**Specify whether the service may be provided by** (*check each that applies*):

- ☐ Legally Responsible Person
- ☐ Relative

☐ Legal Guardian

**Provider Specifications:**

Provider Category	Provider Type Title
Agency	Home Health Agencies

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Extended State Plan Service**

**Service Name: Home Health Aide**

**Provider Category:**

Agency

**Provider Type:**

Home Health Agencies

**Provider Qualifications**

**License** (*specify*):

**Certificate** (*specify*):

Home health agencies certified to participate in the Medicare program (Title XVII of the Social Security Act sections 1861(o) and 1891), and, unless exempted under Iowa Administrative Code, have submitted a surety bond.

**Other Standard** (*specify*):

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age and is not the spouse of the person served or the parent or stepparent of a person aged 17 or under. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider or employed to provide Attendant Care services through the consumer choices option.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

**Verification of Provider Qualifications**

**Entity Responsible for Verification:**

Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years.

## Appendix C: Participant Services

### C-1/C-3: Service Specification

State laws, regulations and policies referenced in the specification are readily available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

**Service Type:**

Extended State Plan Service

**Service Title:**

Nursing

**HCBS Taxonomy:****Category 1:**

05 Nursing

**Sub-Category 1:**

05020 skilled nursing

**Category 2:****Sub-Category 2:****Category 3:****Sub-Category 3:****Category 4:****Sub-Category 4:****Service Definition (Scope):**

Nursing Care Services are an extension of the state plan and are included in the plan of treatment approved by the physician and which are provided by a licensed nurse to persons in the home and community. The services shall be reasonable and necessary to the treatment of the illness or injury and include all nursing tasks recognized by the Iowa board of nursing. Nursing services under the state plan must be exhausted before nursing services are accessed under the waiver.

These services are limited to additional services not otherwise covered under the state plan, including EPSDT, but consistent with waiver objectives of avoiding institutionalization.

Nursing Care Services under the state plan or waiver differ only in the duration of the services available. Nursing Care Services under the waiver do not need to show an attempt to have a predictable end.

The provider qualifications specified in the state plan apply.

The person-centered service plan will address how the person's needs are met. Services must be authorized in the person-centered service plan and monitored by the case manager.

**Specify applicable (if any) limits on the amount, frequency, or duration of this service:**

A unit of service is a visit. A maximum of 10 units are available per week. A unit of nursing services cannot exceed the Medicaid rate applicable to the Medicare-certified home health agency providing the service. The rates for allowable provider types are published in the Iowa Administrative Code. The rates are subject to change on a yearly basis.

The person's case manager is responsible for oversight to avoid duplication of services and to assure state plan services are appropriately authorized in the person's person-centered service plan as needed. Where there is a potential for overlap, services must first be exhausted under Section 110 of the Rehabilitation Act of 1973. The first line of prevention of duplicative billing for similar types of services is the person's case manager. The case manager is responsible for the authorization and monitoring of services in a person's service plan. If the case manager authorizes similar services, they are responsible for ensuring that the services are delivered as described in the person-centered service plan.

Persons enrolled in the waiver have access to Iowa's Waiver of Administrative Rules (WoAR) option. WoARs can be requested but cannot be requested for Federal requirements or state law. Persons needing additional services to ensure health, safety, or other issues can request WoARs. The request must substantiate the exceptional need and also address why no other Medicaid or waiver service can address the issue. Decisions regarding WoAR requests are approved by the Department of Health and Human Services director

**Service Delivery Method (check each that applies):**

☐ Participant-directed as specified in Appendix E

- ☒ **Provider managed**
- ☐ **Remote/via Telehealth**

Specify whether the service may be provided by (check each that applies):

- ☐ **Legally Responsible Person**
- ☒ **Relative**
- ☐ **Legal Guardian**

**Provider Specifications:**

Provider Category	Provider Type Title
Agency	Home Health Agencies

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Extended State Plan Service**

**Service Name: Nursing**

**Provider Category:**

Agency

**Provider Type:**

Home Health Agencies

**Provider Qualifications**

**License (specify):**

**Certificate (specify):**

Home health agencies certified to participate in the Medicare program (Title XVII of the Social Security Act sections 1861(o) and 1891), and, unless exempted under Iowa Administrative Code, have submitted a surety bond.

**Other Standard (specify):**

Provider qualifications specified in the State Plan apply.

Providers must be:

- (1) At least 18 years of age.
- (2) Qualified by training.
- (3) Subject to background checks prior to direct service delivery.

**Verification of Provider Qualifications**

**Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every five years

## Appendix C: Participant Services

### C-1/C-3: Service Specification

State laws, regulations and policies referenced in the specification are readily available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

08/15/2025



**Service Type:**

Supports for Participant Direction

The waiver provides for participant direction of services as specified in Appendix E. Indicate whether the waiver includes the following supports or other supports for participant direction.

**Support for Participant Direction:**

Financial Management Services

**Alternate Service Title (if any):**

Financial Management Services

**HCBS Taxonomy:****Category 1:**

12 Services Supporting Self-Direction

**Sub-Category 1:**

12010 financial management services in support of self-dir

**Category 2:****Sub-Category 2:****Category 3:****Sub-Category 3:****Category 4:****Sub-Category 4:****Service Definition (Scope):**

The Financial Management Service (FMS) is necessary for all persons choosing the self-direction option and will be available only to those who self-direct. The FMS will enroll as a Medicaid Provider. The FMS will receive Medicaid funds in an electronic transfer and will pay all service providers and employees electing the self-direction option. The FMS services are provided to ensure that the personalized budgets are managed and distributed according to the budget developed by each person and to facilitate the employment of service workers by persons. The Iowa Department of Human Services will designate the Financial Management Service entities as organized health care delivery systems.

Responsibilities of the FMS. The FMS shall perform all of the following services:

- 1) Receive Medicaid funds in an electronic transfer.
- 2) Process and pay invoices for approved goods and services included in the person's budget.
- 3) Enter the person's budget into the web-based tracking system chosen by the department and enter expenditures as they are paid.
- 4) Provide real-time person budget account balances for the person, 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).
- 5) Conduct criminal background checks on potential employees pursuant to Iowa Administrative Code.
- 6) Verify for the person an employee's citizenship or alien status.
- 7) Assist the person with fiscal and payroll-related responsibilities including, but not limited to:
  - a) Verifying that hourly wages comply with federal and state labor rules.
  - b) Collecting and processing timecards.
  - c) 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.
  - d) Computing and processing other withholdings, as applicable.
  - e) Processing all judgments, garnishments, tax levies, or other withholding on an employee's pay as may be required by federal, state, or local laws.
  - f) Preparing and issuing employee payroll checks.
  - g) Preparing and disbursing IRS Forms W-2 and W-3 annually.
  - h) Processing federal advance earned income tax credit for eligible employees.
  - i) Refunding over-collected FICA, when appropriate.
  - j) Refunding over-collected FUTA, when appropriate.
- 8) Assist the person in completing required federal, state, and local tax and insurance forms.

- 9) Establish and manage documents and files for the person and the person's employees.
- 10) Monitor timecards, receipts, and invoices to ensure that they are consistent with the person's budget. Keep records of all timecards and invoices for each person for a total of five years.
- 11) Provide to the department, the Independent Support Broker, and the person monthly and quarterly status reports that include a summary of expenditures paid and amount of budget unused.
- 12) Establish an accessible customer service system and a method of communication for the person and the Independent Support Broker that includes alternative communication formats.
- 13) Establish a customer services complaint reporting system.
- 14) Develop a policy and procedures manual that is current with state and federal regulations and update as necessary.
- 15) Develop a business continuity plan in the case of emergencies and natural disasters.
- 16) Provide to the department an annual independent audit of the FMS.
- 17) Assist in implementing the state's quality management strategy related to the FMS.
- 18) Be able to interface with the tracking system(s) chosen by the Iowa Department of Health and Human Services.

The person-centered service plan will address how the person's needs are met. Services must be authorized in the person-centered service plan and monitored by the case manager.

**Specify applicable (if any) limits on the amount, frequency, or duration of this service:**

A unit of service is monthly, billed at a per person per month rate as contained in the Iowa Administrative Code and subject to change on a yearly basis.

**Service Delivery Method** (*check each that applies*):

- ☐ Participant-directed as specified in Appendix E
- ☒ Provider managed
- ☐ Remote/via Telehealth

**Specify whether the service may be provided by** (*check each that applies*):

- ☐ Legally Responsible Person
- ☐ Relative
- ☐ Legal Guardian

**Provider Specifications:**

Provider Category	Provider Type Title
Agency	Financial Institution

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type:** Supports for Participant Direction

**Service Name:** Financial Management Services

**Provider Category:**

Agency

**Provider Type:**

Financial Institution

**Provider Qualifications**

**License** (*specify*):

**Certificate** (*specify*):

**Other Standard** (*specify*):

As defined in Iowa Administrative Code 441, the financial institution shall:

- (1) Either:
- Be cooperative, nonprofit, member-owned and member-controlled, and federally insured through and chartered by either the National Credit Union Administration (NCUA) or the credit union division of the Iowa department of commerce; or
  - Be chartered by the Office of the Comptroller of the Currency, a bureau of the U.S. Department of the Treasury, and insured by the Federal Deposit Insurance Corporation (FDIC).
- (2) The financial institution shall complete a financial management readiness review and certification conducted by the department or its designee.
- (3) The financial institution shall obtain an Internal Revenue Service federal employee identification number dedicated to the financial management service.
- (4) The financial institution shall enroll as a Medicaid provider.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every five years

**Appendix C: Participant Services****C-1/C-3: Service Specification**

State laws, regulations and policies referenced in the specification are readily available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

**Service Type:**

Supports for Participant Direction

The waiver provides for participant direction of services as specified in Appendix E. Indicate whether the waiver includes the following supports or other supports for participant direction.

**Support for Participant Direction:**

Information and Assistance in Support of Participant Direction

**Alternate Service Title (if any):**

Independent Support Broker

**HCBS Taxonomy:****Category 1:**

12 Services Supporting Self-Direction

**Sub-Category 1:**

12020 information and assistance in support of self-direction

**Category 2:****Sub-Category 2:****Category 3:****Sub-Category 3:****Category 4:****Sub-Category 4:**

**Service Definition (Scope):**

Independent Support Brokerage (ISB) service is an optional service for members who choose the self-direction option. When the member chooses the ISB service, the service is included in the person's budget. The ISB will be chosen and hired by the person. The ISB will work with the person to offer technical assistance and expertise for selecting and hiring employees and/or providers and purchasing supports.

When a person does not choose to access an Independent Support Broker, the case manager will work with the person to guide them through the person-centered planning process and offer technical assistance and expertise for selecting and hiring employees and/or providers and purchasing supports.

The ISB shall perform the following services as directed by the person or the person's representative:

- 1) Assist the person with developing the person's initial and subsequent individualized budgets and with making any changes to the individualized budget. The person shall be informed of the individual budget amount from the development of the person-centered service plan. The case manager oversees the services authorized to develop the monthly CCO budget.
- 2) Have monthly contact with the person for the first four months of implementation of the initial budget and have quarterly contact thereafter. If a person needs additional support brokerage service, the person can seek a Waiver of Administrative Rule.
- 3) Support the completion of the required employment packet with the financial management service.
- 4) Assist with interviewing potential employees and entities providing services and supports if requested by the person.
- 5) Assist the person with determining whether a potential employee meets the qualifications necessary to perform the job.
- 6) Assist the person with obtaining a signed consent from a potential employee to conduct background checks if requested by the person.
- 7) Assist the person with negotiating with entities providing services and supports if requested by the person.
- 8) Assist the person with contracts and payment methods for services and supports if requested by the person.
- 9) Document in writing every contact the broker has with the person. Contact documentation shall include information on the extent to which the person's budget has addressed the person's needs and the satisfaction of the person. The case manager, the Financial Management Service and the department may review this documentation at any time.

The person-centered service plan will address how the person's needs are met. Services must be authorized in the person-centered service plan and monitored by the case manager.

**Specify applicable (if any) limits on the amount, frequency, or duration of this service:**

The unit is hourly. The rates for allowable provider types are published in the Iowa Administrative Code and subject to change on a yearly basis.

When an Independent Support Broker is chosen, the service plan shall not exceed a maximum of 30 units per year. Independent Support Brokers may participate in the person-centered planning process but the case manager is responsible for the development of the person-centered service plan.

The person's case manager is responsible for oversight to avoid duplication of services and to assure state plan services are appropriately authorized in the person's person-centered service plan as needed. Where there is a potential for overlap, services must first be exhausted under Section 110 of the Rehabilitation Act of 1973. The first line of prevention of duplicative billing for similar types of services, such as family and community support service, is the person's case manager. The case manager is responsible for the authorization and monitoring of services in a person's service plan. If the case manager authorizes similar services, they are responsible for ensuring that the services are delivered as described in the person-centered service plan.

Persons enrolled in the waiver have access to Iowa's Waiver of Administrative Rules (WoAR) option. WoARs can be requested but cannot be requested for Federal requirements or state law. Persons needing additional services to ensure health, safety, or other issues can request WoARs. The request must substantiate the exceptional need and also address why no other Medicaid or waiver service can address the issue. Decisions regarding WoAR requests are approved by the Department of Health and Human Services director

**Service Delivery Method (check each that applies):**

- ☒ **Participant-directed as specified in Appendix E**
- ☐ **Provider managed**
- ☐ **Remote/via Telehealth**

Specify whether the service may be provided by (check each that applies):

- ☐ Legally Responsible Person  
☒ Relative  
☐ Legal Guardian

**Provider Specifications:**

Provider Category	Provider Type Title
Individual	Individual Support Broker

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Supports for Participant Direction**

**Service Name: Independent Support Broker**

**Provider Category:**

Individual

**Provider Type:**

Individual Support Broker

**Provider Qualifications**

**License (specify):**

**Certificate (specify):**

**Other Standard (specify):**

People who elect the consumer choices option may work with an Independent Support Broker who meets the following qualifications:

- (1) The broker must be at least 18 years of age.
- (2) The broker shall not be the person's guardian, conservator, attorney in fact under a durable power of attorney for health care, power of attorney for financial matters, trustee, or representative payee.
- (3) The broker shall not provide any other paid service to the person receiving supports.
- (4) The broker shall not work for an individual or entity that is providing services to the person receiving supports.
- (5) The broker must consent to a criminal background check and child and dependent adult abuse checks. The results shall be provided to the person receiving supports.
- (6) The broker must complete Independent Support Brokerage training approved by the department.

Once initially trained, the Independent Support Broker is placed on an Independent Support Brokerage registry that is maintained at the Iowa Department of Health and Human Services, Iowa Medicaid.

**Verification of Provider Qualifications**

**Entity Responsible for Verification:**

The Department of Health and Human Services, Iowa Medicaid, designated Fiscal Management Service Provider, and member self-directing their services.

**Frequency of Verification:**

Every 5 years

## Appendix C: Participant Services

**C-1/C-3: Service Specification**

State laws, regulations and policies referenced in the specification are readily available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

**Service Type:**


As provided in 42 CFR §440.180(b)(9), the State requests the authority to provide the following additional service not specified in statute.

**Service Title:**

**HCBS Taxonomy:****Category 1:**

**Sub-Category 1:**

**Category 2:**

**Sub-Category 2:**

**Category 3:**

**Sub-Category 3:**

**Category 4:**

**Sub-Category 4:**

**Service Definition (Scope):**

Service activities performed to help a person with self-care tasks which the person would typically do independently if the person were otherwise able. This service may be provided in a private residence, workplace, or in Assisted Living.

Attendant Care activities may include helping the person with any of the following nonskilled service activities:

- 1) Dressing.
- 2) Bath, shampoo, hygiene, and grooming.
- 3) Access to and from bed or a wheelchair, transferring, ambulation and mobility in general. It is recommended that the provider receive certification of training and return demonstration for transferring. Certification for this is available through the area community colleges.
- 4) Toilet assistance, including bowel, bladder, and catheter assistance.
- 5) Meal preparation, cooking, eating, and feeding but not the cost of meals themselves.
- 6) Housekeeping services which are essential to the person's health care at home, including shopping and laundry.
- 7) Medications ordinarily self-administered including those ordered by a physician or other qualified health care provider. It is recommended the provider successfully complete medication aide course administered by an area community college.
- 8) Wound care.
- 9) Assistance needed to go to or return from a place of employment and assistance with job related tasks while the person is on the job site. The cost of transportation for the person and assistance with understanding or performing the essential job functions are not included in person directed Attendant Care services.
- 10) Tasks such as financial management and scheduling that require cognitive or physical assistance.
- 11) Communication essential to the health and welfare of the person, through interpreting and reading services and use of Assistive Devices for communication.
- 12) Supporting access to and use of transportation essential to the health and welfare of the person. The cost of the transportation is not included.

This service is separate and distinct from Home Health Aide and Home Maintenance Support services; and is monitored by the case manager as part of inclusion in the person plan.

Attendant Care is one of multiple waiver services that may be used to create a self-directed budget amount through Consumer Choices Option (CCO). When Attendant Care is authorized in the CCO budget, the case manager is responsible for ensuring that service needs are met and there is no duplication of services.

The person-centered service plan will address how the person's needs are met. Services must be authorized in the person-centered service plan and monitored by the case manager.

**Specify applicable (if any) limits on the amount, frequency, or duration of this service:**

A unit of service is 15 minutes billed in whole units. The upper limits for allowable provider types are published in the Iowa Administrative Code. The rates are subject to change on a yearly basis.

Attendant care may be provided to a recipient of in-home health related care services, but not at the same time.

The person's case manager is responsible for oversight to avoid duplication of services and to assure state plan services are appropriately authorized in the person's person-centered service plan as needed.

Where there is a potential for overlap, services must first be exhausted under Section 110 of the Rehabilitation Act of 1973. The first line of prevention of duplicative billing for similar types of services is the person's case manager. The case manager is responsible for the authorization and monitoring of services in a person's service plan. If the case manager authorizes similar services, they are responsible for ensuring that the services are delivered as ordered. The IoWANS system generates a review report to assist the case manager. The report identifies all services that are billed for a specific time period (ex. one month). The case manager can view the service billed to the person, the amount of the service billed, and the provider. The case manager can compare what is billed by the provider to what is ordered in the service plan.

Persons enrolled in the waiver have access to Iowa's Waiver of Administrative Rules (WoAR) option. WoARs can be requested but cannot be requested for Federal requirements or state law. Persons needing additional services to ensure health, safety, or other issues can request WoARs. The request must substantiate the exceptional need and also address why no other Medicaid or waiver service can address the issue. Decisions regarding WoAR requests are approved by the Department of Health and Human Services director

These services are limited to additional services not otherwise covered under the state plan, but consistent with waiver objectives of avoiding institutionalization.

**Service Delivery Method** (*check each that applies*):

- ☒ Participant-directed as specified in Appendix E
- ☒ Provider managed
- ☐ Remote/via Telehealth

**Specify whether the service may be provided by** (*check each that applies*):

- ☒ Legally Responsible Person
- ☒ Relative
- ☒ Legal Guardian

**Provider Specifications:**

Provider Category	Provider Type Title
Agency	Supported Community Living
Agency	Home Health Agency
Agency	Community Action Agency
Agency	Area Agency on Aging
Agency	Community Business
Agency	Chore providers
Agency	Assisted living programs
Agency	Adult Day Service Providers
Agency	Home Care Provider

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Attendant Care**

**Provider Category:**

Agency

**Provider Type:**

Supported Community Living

**Provider Qualifications**

**License (specify):**

**Certificate (specify):**

Providers certified by the Department's Home and Community Based Services Quality Oversight Unit to provide Supported Community Living in accordance with Iowa Administrative Code 441.

**Other Standard (specify):**

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

**Verification of Provider Qualifications**

**Entity Responsible for Verification:**

Iowa Department of Health and Human Services Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Attendant Care**

**Provider Category:**

Agency

**Provider Type:**

Home Health Agency

**Provider Qualifications**

**License (specify):**



**Certificate (specify):**

Home health agencies certified to participate in the Medicare program (Title XVII of the Social Security Act sections 1861(o) and 1891), and, unless exempted under Iowa Administrative Code, have submitted a surety bond.

**Other Standard (specify):**

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age or older. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service**

**Service Type: Other Service**

**Service Name: Attendant Care**

**Provider Category:**

Agency

**Provider Type:**

Community Action Agency

**Provider Qualifications****License (specify):****Certificate (specify):**

Community action agencies as designated in Iowa Code section 216A.92 and 93.

**Other Standard (specify):**

Community action agencies designated in Iowa Code section 216A.93 and governed by a board of directors in accordance with Iowa Code 216A.94. Community action agencies:

- (1) Plan and implement strategies to alleviate the conditions of poverty and encourage self-sufficiency for citizens in its service area and in Iowa.
- (2) Obtain and administer assistance from available sources on a common or cooperative basis, in an attempt to provide additional opportunities to low-income persons.
- (3) Establish effective procedures by which the concerned low-income persons and area residents may influence the community action programs affecting them by providing for methods of participation in the implementation of the community action programs and by providing technical support to assist persons to secure assistance available from public

and private sources.

(4) Encourage and support self-help, volunteer, business, labor, and other groups, and organizations to assist public officials and agencies in supporting a community action program.

For this service, the department does not have specific standards for subcontracts or providers regarding training, age limitations, experience, or education. Contracting agencies are responsible for ensuring that the contractor is qualified and reliable. Case managers are responsible for monitoring service provision to ensure services are provided in a safe and effective manner.

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age or older. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Attendant Care**

#### Provider Category:

Agency

#### Provider Type:

Area Agency on Aging

#### Provider Qualifications

**License (specify):**

**Certificate (specify):**

**Other Standard (specify):**

Providers subcontracting with the Area Agencies on Aging or with letters of approval from the Area Agencies on Aging that the organization is qualified to provide attendant care services.

For this service, the department does not have specific standards for subcontracts or providers regarding training, age limitations, experience, or education. Contracting agencies are responsible for ensuring that the contractor is qualified and reliable. Case managers are responsible for monitoring service provision to ensure services are provided in a safe and

effective manner.

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age or older. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

Injury Specialists (ACBIS) as a certified brain injury specialist (CBIS) or certified brain injury specialist trainer (CBIST).

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Attendant Care**

#### Provider Category:

Agency

#### Provider Type:

Community Business

#### Provider Qualifications

##### License (specify):

Community businesses that have all necessary licenses and permits to operate in conformity with federal, state, and local laws and regulations, including Iowa Code Chapter 490, and that submit verification of current liability and workers' compensation insurance.

##### Certificate (specify):

##### Other Standard (specify):

Community businesses that are engaged in the provision of personal care services must submit verification of current liability and workers' compensation coverage.

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an

individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services unit.

##### Frequency of Verification:

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type:** Other Service

**Service Name:** Attendant Care

#### Provider Category:

Agency

#### Provider Type:

Chore providers

#### Provider Qualifications

##### License (*specify*):

##### Certificate (*specify*):

Chore providers subcontracting with area agencies on aging with letters from the area agencies on aging stating that the organization is qualified to provide chore services.

IAC 17—4.4(231)Area agencies on aging.

4.4(1)Designation. The department shall designate for each planning and service area an entity to serve as the area agency on aging in accordance with Older Americans Act requirements.

##### Other Standard (*specify*):

Providers must be:

1. At least 18 years of age.
2. Qualified by training or experience to carry out the member's plan of care pursuant to the department-approved case plan or individual comprehensive plan.
3. Not the recipient of respite services paid through home- and community-based services on behalf of a member who receives home- and community-based services.

The chore agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

The CDAC provider must enter into an agreement with the member receiving services, such that there is a plan to provide medically necessary and approved CDAC services to the member on a recurring basis within the parameters of the service plan, CDAC agreement, and provider standards.

The consumer-directed attendant care provider shall complete Form 470-4389, Consumer-Directed Attendant Care (CDAC) Service Record, for each day of service. The service activities shall not include parenting or child care for or on behalf of the member or on behalf of the provider. The member, parent, guardian, or attorney in fact under a durable power of attorney for health care and the provider shall complete, sign, and date Form 470-3372, HCBS Consumer-Directed Attendant Care Agreement. A copy of the completed agreement shall be attached to the service plan and kept in the member's records. If the member has a guardian or attorney in fact under a durable power of attorney for health care, the

care plan shall address how consumer-directed attendant care services will be monitored to ensure the member's needs are being adequately met. If the guardian or attorney in fact is the service provider, the service plan shall address how the service worker or case manager shall oversee service provision.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every four years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service**

**Service Type: Other Service**

**Service Name: Attendant Care**

**Provider Category:**

Agency

**Provider Type:**

Assisted living programs

**Provider Qualifications****License (specify):****Certificate (specify):**

Assisted Living programs certified by the Iowa Department of Inspections and Appeals under Iowa Administrative Code 481.

**Other Standard (specify):**

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age or older. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

**Appendix C: Participant Services**

**C-1/C-3: Provider Specifications for Service**

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**Service Type: Other Service**  
**Service Name: Attendant Care**

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**Provider Category:**

Agency

**Provider Type:**

Adult Day Service Providers

**Provider Qualifications****License (specify):****Certificate (specify):**

Adult Day Care Providers certified by the Iowa Department of Inspections and Appeals under Iowa Administrative Code 481.

**Other Standard (specify):**

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age or older. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service**

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**Service Type: Other Service**  
**Service Name: Attendant Care**

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**Provider Category:**

Agency

**Provider Type:**

Home Care Provider

**Provider Qualifications****License (specify):**

**Certificate (specify):**

Home care providers that have a contract with the HHS or have written certification from HHS stating they meet the home care standards and requirements set forth in Iowa Administrative Code 641.

**Other Standard (specify):**

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age or older. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

**Appendix C: Participant Services****C-1/C-3: Service Specification**

State laws, regulations and policies referenced in the specification are readily available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

**Service Type:**

Other Service

As provided in 42 CFR §440.180(b)(9), the State requests the authority to provide the following additional service not specified in statute.

**Service Title:**

Counseling

**HCBS Taxonomy:****Category 1:**

10 Other Mental Health and Behavioral Services

**Sub-Category 1:**

10060 counseling

**Category 2:****Sub-Category 2:****Category 3:****Sub-Category 3:**

**Category 4:****Sub-Category 4:****Service Definition (Scope):**

Counseling services are face-to-face mental health services provided to the member and caregiver by a mental health professional as defined in rule 441 - 24.1(225C) to facilitate home management and prevent institutionalization. Counseling services are non-psychiatric services necessary for the management of depression, assistance with the grief process, alleviation of psychosocial isolation and support in coping with a disability or illness, including terminal illness. Counseling services may be provided both for the purpose of training the member's family or other caregiver to provide care and for the purpose of helping the member and those caring for the member to adjust to the member's disability or terminal condition. Counseling services may be provided to the member's caregiver only when included in the service plan for the member.

Providers delivering this service via the Telehealth service delivery option must demonstrate policies and procedures that include:

-Compliance with all state requirements related to telehealth as described in Iowa Code 514c.34

- HIPAA compliant platforms;
- Client support given when client needs include: accessibility, translation, or limited auditory or visual capacities are present;
- Have a contingency plan for provision of services if technology fails;
- Professionals do not practice outside of their respective scope; and
- Assessment of clients and caregivers that identifies a client's ability to participate in and outlines any accommodations needed while using Telehealth

Services delivered via telehealth will be delivered in a setting/location that protects the waiver participants privacy and therefore not permitted to be delivered in settings such as bathrooms.

Telehealth is an available service delivery modality when the member chooses to receive their services via telehealth and the service modality is clinically appropriate to the member's assessed needs.

In-person visit is not a prerequisite for the delivery of HBH through Telehealth.

The state works closely with the agency providers to develop and provide training and other resources on the delivery of HCBS. The state will continue to support individuals receiving HCBS through the established service monitoring activities of the Case Managers, Community-Based Case Managers, the quality oversight activities of the HCBS QIO and providing technical assistance, information and additional resources as the need is identified.

In-person contact is not required as a prerequisite for payment.

These services are limited to additional services not otherwise covered under the state plan, including EPSDT, but consistent with waiver objectives of avoiding institutionalization.

Telehealth" means the delivery of services through the use of real-time interactive audio and video, or other real-time interactive electronic media, regardless of where the health care professional and the covered person are each located. "Telehealth" does not include the delivery of health care services delivered solely through an audio-only telephone, electronic mail message, or facsimile transmission.

**Specify applicable (if any) limits on the amount, frequency, or duration of this service:**

A unit of individual counseling for the waiver member or the waiver member and the member's caregiver is 15 minutes. A unit group counseling is 15 minutes. Payment for group counseling is based on the group rate divided by six, or if the number of persons who comprise the groups exceeds six, the actual number of persons who comprise the group.

The member's service plan will address how the member's health care needs are being met. The services must be authorized in the service plan. The case manager/service worker will monitor the plan. Authorization of this service must be made after assuring that there is no duplication or overlapping of state plan services. Services provided under IDEA or the Rehabilitation Act of 1973 are not available.

Providers delivering this service via the Telehealth service delivery option must demonstrate policies and procedures that



include:

- HIPAA compliant platforms;
- Client support given when client needs include: accessibility, translation, or limited auditory or visual capacities are present;
- Have a contingency plan for provision of services if technology fails;
- Professionals do not practice outside of their respective scope; and
- Assessment of clients and caregivers that identifies a client's ability to participate in and outlines any accommodations needed while using Telehealth.

**Service Delivery Method** (check each that applies):

- ☐ Participant-directed as specified in Appendix E
- ☒ Provider managed
- ☒ Remote/via Telehealth

**Specify whether the service may be provided by** (check each that applies):

- ☐ Legally Responsible Person
- ☒ Relative
- ☐ Legal Guardian

**Provider Specifications:**

Provider Category	Provider Type Title
Agency	Mental Health Service Providers
Agency	Licensed Hospice Agencies
Agency	Community Mental Health Centers

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Counseling**

**Provider Category:**

Agency

**Provider Type:**

Mental Health Service Providers

**Provider Qualifications**

**License** (specify):

**Certificate** (specify):

Agencies which are accredited under the mental health service provider standards established by the mental health and developmental disabilities commission, set forth in 441—Chapter 24, Divisions I and IV.

**Other Standard** (specify):

Providers must be:

- (1) At least 18 years of age.
- (2) Qualified by training.
- (3) Subject to background checks prior to direct service delivery.

**Verification of Provider Qualifications**

**Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every four years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Counseling**

**Provider Category:**

Agency

**Provider Type:**

Licensed Hospice Agencies

**Provider Qualifications**

**License (specify):**

Agencies which are licensed as meeting the hospice standards and requirements set forth in department of inspections and appeals rules 481—Chapter 53 or which are certified to meet the standards under the Medicare program for hospice programs.

**Certificate (specify):**

**Other Standard (specify):**

Providers must be:

- (1) At least 18 years of age.
- (2) Qualified by training.
- (3) Subject to background checks prior to direct service delivery.

**Verification of Provider Qualifications**

**Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every four years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Counseling**

**Provider Category:**

Agency

**Provider Type:**

Community Mental Health Centers

**Provider Qualifications**

**License (specify):**

**Certificate (specify):**

Agencies which are certified under the community mental health center standards established by the mental health and developmental disabilities commission, set forth in 441—Chapter 24, Divisions I and III.

**Other Standard (specify):**

Providers must be:

- (1) At least 18 years of age.

- (2) Qualified by training.
- (3) Subject to background checks prior to direct service delivery.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every four years

**Appendix C: Participant Services****C-1/C-3: Service Specification**

State laws, regulations and policies referenced in the specification are readily available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

**Service Type:**

Other Service

As provided in 42 CFR §440.180(b)(9), the State requests the authority to provide the following additional service not specified in statute.

**Service Title:**

Home Delivered Meals

**HCBS Taxonomy:****Category 1:**

06 Home Delivered Meals

**Sub-Category 1:**

06010 home delivered meals

**Category 2:****Sub-Category 2:****Category 3:****Sub-Category 3:****Category 4:****Sub-Category 4:****Service Definition (Scope):**

Home-Delivered Meals are meals prepared elsewhere and delivered to a person's residence. Each meal shall ensure the person receives a minimum of one third of the daily recommended dietary allowance as established by the Food and Nutrition Board of the National of the National Research Council of the National Academy of Sciences. The meal may be a liquid supplement which meets the minimum one third daily dietary allowance standard. When a restaurant provides the home delivered meal, the person is required to have nutritional consultation. The nutritional consultation includes contact with the restaurant to explain the dietary needs of the person and explain what constitutes the minimum one third daily dietary allowance.

The person-centered service plan will address how the person's needs are met. Services must be authorized in the person-centered service plan and monitored by the case manager.

These services are limited to additional services not otherwise covered under the state plan, but consistent with waiver objectives of avoiding institutionalization.

**Specify applicable (if any) limits on the amount, frequency, or duration of this service:**

A unit of service is a meal. A maximum of 14 meals is allowed per week. The rates for allowable provider types are published in the Iowa Administrative Code. The rates are subject to change on a yearly basis.

The person's case manager is responsible for oversight to avoid duplication of services and to assure state plan services are appropriately authorized in the person's person-centered service plan as needed. The first line of prevention of duplicative billing for similar types of services, such as Attendant Care, is the person's case manager. While Attendant Care may cover meal prep and clean up, Home Delivered Meals cover the cost of food which is not covered under any other waiver service. The case manager is responsible for the authorization and monitoring of services in a person's service plan. If the case manager requests authorization for similar services, they are responsible for ensuring that the services are delivered as written in the person-centered service plan.

Persons enrolled in the waiver have access to Iowa's Waiver of Administrative Rules (WoAR) option. WoARs can be requested but cannot be requested for Federal requirements or state law. Persons needing additional services to ensure health, safety, or other issues can request WoARs. The request must substantiate the exceptional need and also address why no other Medicaid or waiver service can address the issue. Decisions regarding WoAR requests are approved by the Department of Health and Human Services director.

**Service Delivery Method** (*check each that applies*):

- ☒ Participant-directed as specified in Appendix E
- ☒ Provider managed
- ☐ Remote/via Telehealth

**Specify whether the service may be provided by** (*check each that applies*):

- ☐ Legally Responsible Person
- ☒ Relative
- ☐ Legal Guardian

**Provider Specifications:**

Provider Category	Provider Type Title
Agency	Home Health Agency
Agency	Hospitals
Agency	Assisted Living Facility
Agency	Area Agencies on Aging
Agency	Community Action Agency
Agency	Home Care Agency
Agency	Restaurants
Agency	Nursing Facility
Agency	Medical Equipment and Supply Dealers

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type:** Other Service

**Service Name:** Home Delivered Meals

**Provider Category:**

Agency

**Provider Type:**

Home Health Agency

### Provider Qualifications

#### License (specify):

#### Certificate (specify):

Home care providers meeting the standards set forth in subrule 77.33(4):

- a. Certified as a home health agency under Medicare, or
- b. Authorized to provide similar services through a contract with the Iowa department of public health (IDPH) for local public health services. The agency must provide a current IDPH local public health services contract number.

#### Other Standard (specify):

### Verification of Provider Qualifications

#### Entity Responsible for Verification:

Iowa Department Of Health and Human Services Iowa Medicaid, Provider Services Unit

#### Frequency of Verification:

Every four years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Home Delivered Meals**

#### Provider Category:

Agency

#### Provider Type:

Hospitals

### Provider Qualifications

#### License (specify):

Enrolled as a Medicaid Provider as described in IAC 441 Chapter 77. All hospitals licensed in the state of Iowa or in another state.

#### Certificate (specify):

Certified as eligible to participate in Part A of the Medicare program (Title XVIII of the Social Security Act) are eligible to participate in the medical assistance program, subject to the additional requirements outlined in Iowa Administrative Code.

#### Other Standard (specify):

Food service establishments are places that prepare food for individual portion service and include catering operations. Both retail food establishments and food service establishments are regulated under the 1997 FDA Food Code. The purpose of the Food Code is to safeguard the public health and provide food to People that is safe, unadulterated, and honestly presented.

### Verification of Provider Qualifications

#### Entity Responsible for Verification:

Iowa Department Of Health and Human Services, Iowa Medicaid, Provider Services Unit

#### Frequency of Verification:

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service****Service Name: Home Delivered Meals****Provider Category:**

Agency

**Provider Type:**

Assisted Living Facility

**Provider Qualifications****License (specify):****Certificate (specify):**

Assisted Living programs that are licensed by the Iowa Department of Inspections and Appeals under Iowa Administrative Code 481.

**Other Standard (specify):**

For this service, the department does not have specific standards for subcontracts or providers regarding training, age limitations, experience, or education than what would be contained in IAC 481-chapter 69. Contracting agencies are responsible for ensuring that the contractor is qualified and reliable. Case managers are responsible for monitoring service provision to ensure services are provided in a safe and effective manner. Food service establishments are places that prepare food for individual portion service and include catering operations. Both retail food establishments and food service establishments are regulated under the 1997 FDA Food Code. The purpose of the Food Code is to safeguard the public health and provide food to People that is safe, unadulterated, and honestly presented.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service****Service Type: Other Service****Service Name: Home Delivered Meals****Provider Category:**

Agency

**Provider Type:**

Area Agencies on Aging

**Provider Qualifications****License (specify):****Certificate (specify):****Other Standard (specify):**

Area agency on aging designated in accordance with Iowa Code 231 or home-delivered meals providers subcontracting with Area Agencies on Aging or with letters of approval from the Area Agencies on Aging stating the organization is qualified to provide home-delivered meals services.

For this service, the department does not have specific standards for subcontracts or providers regarding training, age limitations, experience, or education, other than what would be contained in statute or administrative rules for this provider. Contracting agencies are responsible for ensuring that the contractor is qualified and reliable. Case managers are responsible

for monitoring service provision to ensure services are provided in a safe and effective manner.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service**

**Service Type: Other Service**

**Service Name: Home Delivered Meals**

**Provider Category:**

Agency

**Provider Type:**

Community Action Agency

**Provider Qualifications****License (specify):****Certificate (specify):****Other Standard (specify):**

Community action agencies designated in Iowa Code section 216A.93 and governed by a board of directors in accordance with Iowa Code 216A.94.

For this service, the department does not have specific standards for subcontracts or providers regarding training, age limitations, experience, or education. Contracting agencies are responsible for ensuring that the contractor is qualified and reliable. Case managers are responsible for monitoring service provision to ensure services are provided in a safe and effective manner.

Food service establishments are places that prepare food for individual portion service and include catering operations. Both retail food establishments and food service establishments are regulated under the 1997 FDA Food Code. The purpose of the Food Code is to safeguard the public health and provide food to People that is safe, unadulterated, and honestly presented.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department Of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service**

**Service Type: Other Service**

**Service Name: Home Delivered Meals**

**Provider Category:**

Agency

**Provider Type:**

Home Care Agency

**Provider Qualifications****License (specify):****Certificate (specify):**

Home care providers that have a contract with HHS or have written certification from HHS stating they meet the home care standards and requirements set forth in Iowa Administrative Code 641.

**Other Standard (specify):**

Food service establishments are places that prepare food for individual portion service and include catering operations. Both retail food establishments and food service establishments are regulated under the 1997 FDA Food Code. The purpose of the Food Code is to safeguard the public health and provide food to People that is safe, unadulterated, and honestly presented.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department Of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every five years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service****Service Type: Other Service****Service Name: Home Delivered Meals****Provider Category:**

Agency

**Provider Type:**

Restaurants

**Provider Qualifications****License (specify):**

Licensed and inspected under Iowa Code Chapter 137F: A person shall not operate a food establishment or food processing plant to provide goods or services to the general public, or open a food establishment to the general public, until the appropriate license has been obtained from the regulatory authority. Sale of products at wholesale to outlets not owned by a commissary owner requires a food processing plant license. A license shall expire one year from the date of issue. A license is renewable.

The appropriate regulatory authority shall provide for the inspection of each food establishment and food processing plant in accordance with the Iowa Administrative Code. A regulatory authority may enter a food establishment or food processing plant at any reasonable hour to conduct an inspection. The manager or person in charge of the food establishment or food processing plant shall afford free access to every part of the premises and render all aid and assistance necessary to enable the regulatory authority to make a thorough and complete inspection. As part of the inspection process, the regulatory authority shall provide an explanation of the violation or violations cited and provide guidance as to actions for correction and elimination of the violation or violations.

**Certificate (specify):****Other Standard (specify):**

Food service establishments are places that prepare food for individual portion service and include catering operations. Both retail food establishments and food service establishments are regulated under the 1997 FDA Food Code. The purpose of the Food Code is to safeguard the public health and provide food to People that is safe, unadulterated, and honestly presented.

**Verification of Provider Qualifications****Entity Responsible for Verification:**



Iowa Department Of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Home Delivered Meals**

**Provider Category:**

Agency

**Provider Type:**

Nursing Facility

**Provider Qualifications****License (specify):**

Licensed pursuant to Iowa Code Chapter 135C and qualifying for Medicaid enrollment as described in IAC 441 Chapter 81.

**Certificate (specify):**

“Facility” means a licensed nursing facility certified in accordance with the provisions of 42 CFR Part 483 to provide health services and includes hospital-based nursing facilities that are Medicare-certified and provide only skilled level of care and swing-bed hospitals unless stated otherwise.

**Other Standard (specify):**

Food service establishments are places that prepare food for individual portion service and include catering operations. Both retail food establishments and food service establishments are regulated under the 1997 FDA Food Code. The purpose of the Food Code is to safeguard the public health and provide food to People that is safe, unadulterated, and honestly presented.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department Of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Home Delivered Meals**

**Provider Category:**

Agency

**Provider Type:**

Medical Equipment and Supply Dealers

**Provider Qualifications****License (specify):****Certificate (specify):**

Medical equipment and supply dealer certified to participate in the Medicaid program as defined by IAC 441 Chapter 77.10. All dealers in medical equipment and appliances, prosthetic devices and medical supplies in Iowa or in other states are

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eligible to participate in the program.

**Other Standard (specify):**

Food service establishments are places that prepare food for individual portion service and include catering operations. Both retail food establishments and food service establishments are regulated under the 1997 FDA Food Code. The purpose of the Food Code is to safeguard the public health and provide food to People that is safe, unadulterated, and honestly presented.

**Verification of Provider Qualifications**

**Entity Responsible for Verification:**

Iowa Department Of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every four years

## Appendix C: Participant Services

### C-1/C-3: Service Specification

State laws, regulations and policies referenced in the specification are readily available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

**Service Type:**

Other Service

As provided in 42 CFR §440.180(b)(9), the State requests the authority to provide the following additional service not specified in statute.

**Service Title:**

Home Maintenance Support

**HCBS Taxonomy:**

**Category 1:**

08 Home-Based Services

**Sub-Category 1:**

08050 homemaker

**Category 2:**

08 Home-Based Services

**Sub-Category 2:**

08060 chore

**Category 3:**

**Sub-Category 3:**

**Category 4:**

**Sub-Category 4:**

**Service Definition (Scope):**

Home Maintenance Support services encompass assistance required to maintain the participant's home as a clean, sanitary, and safe environment, provided when neither the person nor any household person is capable of performing these tasks, and no other relative, caregiver, or landlord is responsible for them. These services are particularly essential when the person lives alone or when the usual caregiver needs support in performing these functions. Usual caregiver means an unpaid person or persons who reside with the member and are available on a 24-hour per-day basis to assume responsibility for the care of the member. These may involve tasks such as:

- 1) Essential shopping: shopping for basic need items such as food, clothing or personal care items, or drugs.

- 2) Limited housecleaning: maintenance cleaning such as vacuuming, dusting, scrubbing floors, defrosting refrigerators, cleaning stoves, cleaning medical equipment, washing, and mending clothes, washing personal items used by the client, and dishes.
- 3) Window and door maintenance, such as hanging screen windows and doors, replacing window panes, and washing windows;
- 4) Minor repairs to walls, floors, stairs, railings and handles;
- 5) Heavy cleaning which includes cleaning attics or basements to remove fire hazards, moving heavy furniture, extensive wall washing, floor care or painting and trash removal;
- 6) Mowing lawns and removing snow and ice from sidewalks and driveways.
- 7) Tree or bush trimming when the tree or bush impairs safe navigation of the exterior of the home.
- 8) Pest eradication and one-time cleaning following the pest eradication necessary for the person's health and safety

The person-centered service plan will address how the person's needs are met. Services must be authorized in the person-centered service plan and monitored by the case manager.

**Specify applicable (if any) limits on the amount, frequency, or duration of this service:**

A unit of service is 15 minutes.

Excluded services and costs. Services, activities, costs, and time that are not covered include the following (not an exclusive list):

- 1) Tree trimming
- 2) Trash burning
- 3) Tree removal

This service must not duplicate nor be furnished/claimed at the same time of day as Attendant Care. The first line of prevention of duplicative billing for similar types of services, such as Attendant Care, is the person's case manager. The case manager is responsible for the authorization and monitoring of services in a person's service plan. If the case manager authorizes similar services, they are responsible for ensuring that the services are delivered as ordered.

Persons enrolled in the waiver have access to Iowa's Waiver of Administrative Rules (WoAR) option. WoARs can be requested but cannot be requested for Federal requirements or state law. Persons needing additional services to ensure health, safety, or other issues can request WoARs. The request must substantiate the exceptional need and also address why no other Medicaid or waiver service can address the issue. Decisions regarding WoAR requests are approved by the Department of Health and Human Services director

**Service Delivery Method** (*check each that applies*):

- ☒ **Participant-directed as specified in Appendix E**
- ☒ **Provider managed**
- ☐ **Remote/via Telehealth**

**Specify whether the service may be provided by** (*check each that applies*):

- ☐ **Legally Responsible Person**
- ☒ **Relative**
- ☐ **Legal Guardian**

**Provider Specifications:**

Provider Category	Provider Type Title
Agency	Nursing Facility
Agency	Area Agency on Aging
Agency	Home Health Agencies
Agency	Community Action Agency
Agency	Community Business

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Home Maintenance Support**

**Provider Category:**

Agency

**Provider Type:**

Nursing Facility

**Provider Qualifications**

**License (specify):**

Licensed pursuant to Iowa Code Chapter 135C and qualifying for Medicaid enrollment as described in Iowa Administrative Code 441.

**Certificate (specify):**

"Facility" means a licensed nursing facility certified in accordance with the provisions of 42 CFR Part 483, as amended to September 23, 1992, to provide health services and includes hospital-based nursing facilities that are Medicare-certified and provide only skilled level of care and swing-bed hospitals unless stated otherwise.

**Other Standard (specify):**

Submit verification of current liability and workers' compensation coverage. All personnel providing Home Maintenance Support shall:

- b. Be at least 18 years of age.
- c. Be able to communicate successfully with the person receiving supports.
- d. Not be the recipient of respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- e. Not be the parent or stepparent of a minor child or the spouse of a person receiving supports

For this service the department does not have specific standards regarding training, limitations, experience or education. Case managers are responsible to monitor service provision to ensure services are provided in a safe and effective manner

**Verification of Provider Qualifications**

**Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Home Maintenance Support**

**Provider Category:**

Agency

**Provider Type:**

Area Agency on Aging

**Provider Qualifications**

**License (specify):**

**Certificate (specify):**

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**Other Standard (specify):**

Area Agency on Aging (AAA) designated in accordance with Iowa Code 231 or providers subcontracting with area agencies on aging or with letters of approval from the area agencies on aging stating the organization is qualified to provide Home Maintenance services.

AAA shall maintain a file of all current contracts with service-providing agencies or organizations. These files shall be made available for monitoring and assessment by the department.

Contracts with for-profit organizations. An AAA must request prior approval from the department of any proposed service contracts with for-profit organizations under an area plan.

- (1) A separate approval request, using the request form provided by the department, shall be filed for each contract between the AAA and a provider for a service that is proposed to be delivered by a for-profit organization.
  - a. The request for approval shall be submitted to the department at least 30 days prior to the signing of the contract.
  - b. All applicants to provide services for which the contract is proposed shall be listed on the request form.
- (2) The department may approve the contracts only if the AAA demonstrates that the for-profit organization can provide services that are consistent with the goals of the AAA as stated in the area plan.

All personnel providing Home Maintenance Support shall:

- (1) Be at least 18 years of age.
- (2) Be able to communicate successfully with the person receiving supports.
- (3) Not be the recipient of respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Not be the parent or stepparent of a minor child or the spouse of a person receiving supports

For this service the department does not have specific standards regarding training, limitations, experience or education.. Case managers are responsible to monitor service provision to ensure services are provided in a safe and effective manner

For this service, the department does not have specific standards for subcontracts or providers regarding training, limitations, experience, or education beyond those implemented by the contracting agency. Contracting agencies are responsible for ensuring that the contractor is qualified and reliable. Case managers are responsible to monitor service provision to ensure services are provided in a safe and effective manner. Providers are required to submit verification of current liability and workers' compensation coverage.

Providers that were granted enrollment as chore providers based upon the Area Agencies on Aging (AAA) criteria are 'grandfathered' as Home Maintenance Support providers. Because the AAAs decided collectively that beginning June 30, 2010, they will no longer issue contracts or letters of recommendation, the state has not allowed applicants to enroll as chore providers using this criteria option. Providers can enroll as Community Providers

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service**

**Service Type: Other Service**

**Service Name: Home Maintenance Support**

**Provider Category:**

Agency

**Provider Type:**

Home Health Agencies

**Provider Qualifications****License (specify):****Certificate (specify):**

Home health agencies certified to participate in the Medicare program (Title XVII of the Social Security Act sections 1861(o) and 1891), and, unless exempted under Iowa Administrative Code, have submitted a surety bond.

**Other Standard (specify):**

Submit verification of current liability and workers' compensation coverage. All personnel providing Home Maintenance Support shall:

- (1) Be at least 18 years of age.
- (2) Be able to communicate successfully with the person receiving supports.
- (3) Not be the recipient of respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Not be the parent or stepparent of a minor child or the spouse of a person receiving supports For this service the department does not have specific standards regarding training, limitations, experience or education.. Case managers are responsible to monitor service provision to ensure services are provided in a safe and effective manner.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every five years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service****Service Name: Home Maintenance Support****Provider Category:**

Agency

**Provider Type:**

Community Action Agency

**Provider Qualifications****License (specify):****Certificate (specify):****Other Standard (specify):**

Community action agencies designated in Iowa Code section 216A.93 and governed by a board of directors in accordance with Iowa Code 216A.94..

All personnel providing Home Maintenance Support shall:

- (1) Be at least 18 years of age.
- (2) Be able to communicate successfully with the person receiving supports.
- (3) Not be the recipient of respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Not be the parent or stepparent of a minor child or the spouse of a person receiving supports

For this service the department does not have specific standards regarding training, limitations, experience or education..  
Case managers are responsible to monitor service provision to ensure services are provided in a safe and effective manner.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service**

**Service Type: Other Service**

**Service Name: Home Maintenance Support**

**Provider Category:**

Agency

**Provider Type:**

Community Business

**Provider Qualifications****License (specify):**

Community businesses that have all necessary licenses and permits to operate in conformity with federal, state, and local laws and regulations, including Iowa Code Chapter 490, and that submit verification of current liability and workers' compensation insurance.

**Certificate (specify):****Other Standard (specify):**

All personnel providing Home Maintenance Support shall:

- (1) Be at least 18 years of age.
- (2) Be able to communicate successfully with the person receiving supports.
- (3) Not be the recipient of respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Not be the parent or stepparent of a minor child or the spouse of a person receiving supports

For this service the department does not have specific standards regarding training, limitations, experience or education.  
Case managers are responsible to monitor service provision to ensure services are provided in a safe and effective manner

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every five years

**Appendix C: Participant Services****C-1/C-3: Service Specification**

State laws, regulations and policies referenced in the specification are readily available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

**Service Type:**

Other Service

As provided in 42 CFR §440.180(b)(9), the State requests the authority to provide the following additional service not specified in statute.

**Service Title:**

Individual Directed Goods and Services

**HCBS Taxonomy:****Category 1:**

17 Other Services

**Sub-Category 1:**

17010 goods and services

**Category 2:****Sub-Category 2:****Category 3:****Sub-Category 3:****Category 4:****Sub-Category 4:****Service Definition (Scope):**

Individual-directed goods and services are services, equipment, or supplies not otherwise provided through the Medicaid program that address an assessed need or goal identified in the member's service plan. The item or service shall meet the following requirements:

1. Promote opportunities for community living and inclusion.
2. Increase independence or substitute for human assistance, to the extent the expenditures would otherwise be made for that human assistance.
3. Be accommodated within the member's budget without compromising the member's health and safety.
4. Be provided to the member or directed exclusively toward the benefit of the member.
5. Be the least costly to meet the member's needs.
6. Not be available through another source.

Members (or guardians) who have chosen the self-direction program must be willing to take on the responsibility of employee supervision and training. Participants or their guardians must review all time cards to ensure accuracy and work with their service worker/case manager and Independent Support Broker (ISB) to budget services. If a member is not satisfied with the work of their employee, they have full authority to terminate them as a provider of services.

These services are limited to additional services not otherwise covered under the state plan, including EPSDT, but consistent with waiver objectives of avoiding institutionalization.

**Specify applicable (if any) limits on the amount, frequency, or duration of this service:**

Individual directed goods and services must be documented on the individual budget. The individual budget limit will be based on the service plan and the need for the services available to be converted. A utilization adjustment rate will be applied to the individual budget amount.

The following goods and services may not be purchased using self-directed budget:

1. Child care services.
2. Clothing not related to an assessed medical need.
3. Conference, meeting or similar venue expenses other than the costs of approved services the member needs while attending the conference, meeting or similar venue.
4. Costs associated with shipping items to the member.
5. Experimental and non-FDA-approved medications, therapies, or treatments.



6. Goods or services covered by other Medicaid programs.
7. Home furnishings.
8. Home repairs or home maintenance.
9. Homeopathic treatments.
10. Insurance premiums or copayments.
11. Items purchased on installment payments.
12. Motorized vehicles.
13. Nutritional supplements.
14. Personal entertainment items.
15. Repairs and maintenance of motor vehicles.
16. Room and board, including rent or mortgage payments.
17. School tuition.
18. Service animals.
19. Services covered by third parties or services that are the responsibility of a non-Medicaid program.
20. Sheltered workshop services.
21. Social or recreational purchases not related to an assessed need or goal identified in the member's service plan.
22. Vacation expenses, other than the costs of approved services the member needs while on vacation.

Members enrolled in the waiver have access to Iowa Medicaid's Waiver to Iowa Administrative Code (IAC) option. Waivers to IAC cannot be requested for Federal requirements or state law. Members needing additional services in order to ensure health, safety, or other issues can request Waivers to IAC. The request must substantiate the exceptional need and also address why no other Medicaid or waiver service can address the issue. Decisions regarding Waivers to IAC requests are approved by the Department of Health and Human Services director.

**Service Delivery Method** (*check each that applies*):

- ☒ **Participant-directed as specified in Appendix E**
- ☐ **Provider managed**
- ☐ **Remote/via Telehealth**

**Specify whether the service may be provided by** (*check each that applies*):

- ☒ **Legally Responsible Person**
- ☒ **Relative**
- ☒ **Legal Guardian**

**Provider Specifications:**

Provider Category	Provider Type Title
Agency	Individual Directed Goods and Services
Individual	Individual Directed Goods and Services

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Individual Directed Goods and Services**

**Provider Category:**

Agency

**Provider Type:**

Individual Directed Goods and Services

**Provider Qualifications**

**License** (*specify*):

**Certificate (specify):****Other Standard (specify):**

Members who elect the consumer choices option may choose to purchase individual directed goods and services. Providers must have current liability and workers' compensation coverage as required by law.

All personnel providing self-directed community supports and employment shall:

- (1) Be at least 18 years of age.
- (2) Be able to communicate successfully with the member.
- (3) Not be the recipient of respite services paid through home- and community-based services on behalf of a member who receives home- and community-based services.
- (4) Not be the recipient of respite services paid through the consumer choices option on behalf of a member who receives the consumer choices option.

d. The provider of individual-directed goods and services shall:

- (1) Prepare timecards or invoices approved by the department that identify what services were provided and the time when services were provided.
- (2) Submit invoices and time sheets to the financial management service no later than 30 calendar days from the date when the last service in the billing period was provided. Payment shall not be made if invoices and time sheets are received after this 30-day period.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

The member, Financial Management System (FMS) Provider and Iowa Department of Health and Human Services are responsible for the verification of provider qualifications. The member verifies that employees hired have the skills and training needed to provide direct services. The FMS is responsible for the employer tasks such as completing employee background checks, verify employee citizenship or aliens status, and assuring wages are within the Department of Labor standards. The Department verifies the employee criminal and abuse background checks.

**Frequency of Verification:**

Verification of qualifications occurs at the time of initial use by a member in the CCO program

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service**

**Service Type: Other Service**

**Service Name: Individual Directed Goods and Services**

**Provider Category:**

Individual

**Provider Type:**

Individual Directed Goods and Services

**Provider Qualifications****License (specify):**

An individual providing individual-directed goods and services shall have all the necessary licenses required by federal, state, and local laws, including a valid driver's license if providing transportation. The type of license needed will be dependent on the type of good or service being purchased through CCO. It is the responsibility of the member to assure that any good or service being purchased through CCO that requires licensure has the needed licensure prior to the purchase of the good or service.

**Certificate (specify):****Other Standard (specify):**

Members who elect the consumer choices option may choose to purchase individual-directed goods and services from an individual or business that meets the following requirements.

- a. A business providing individual-directed goods and services shall:
- (1) Have all the necessary licenses and permits to operate in conformity with federal, state, and local laws and regulations; and
  - (2) Have current liability and workers' compensation coverage.
- b. An individual providing individual-directed goods and services shall have all the necessary licenses required by federal, state, and local laws, including a valid driver's license if providing transportation.
- c. All personnel providing individual-directed goods and services shall:
- (1) Be at least 18 years of age.
  - (2) Be able to communicate successfully with the member.
  - (3) Not be the recipient of respite services paid through home- and community-based services on behalf of a member who receives home- and community-based services.
  - (4) Not be the recipient of respite services paid through the consumer choices option on behalf of a member who receives the consumer choices option.
- d. The provider of individual-directed goods and services shall:
- (1) Prepare timecards or invoices approved by the department that identify what services were provided and the time when services were provided.
  - (2) Submit invoices and timesheets to the financial management service no later than 30 calendar days from the date when the last service in the billing period was provided. Payment shall not be made if invoices and timesheets are received after this 30-day period.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

The member, Financial Management System (FMS) Provider and Iowa Department of Health and Human Services are responsible for the verification of provider qualifications. The member verifies that employees hired have the skills and training needed to provide direct services. The FMS is responsible for the employer tasks such as completing employee background checks, verify employee citizenship or aliens status, and assuring wages are within the Department of Labor standards. The Department verifies the employee criminal and abuse background checks.

**Frequency of Verification:**

Verification of qualifications occurs at the time of initial use by a member in the CCO program

**Appendix C: Participant Services****C-1/C-3: Service Specification**

State laws, regulations and policies referenced in the specification are readily available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

**Service Type:**

Other Service

As provided in 42 CFR §440.180(b)(9), the State requests the authority to provide the following additional service not specified in statute.

**Service Title:**

Self Directed Community Support and Employment

**HCBS Taxonomy:****Category 1:**

03 Supported Employment

**Sub-Category 1:**

03021 ongoing supported employment, individual

**Category 2:**

03 Supported Employment

**Sub-Category 2:**

03022 ongoing supported employment, group

**Category 3:****Sub-Category 3:****Category 4:****Sub-Category 4:****Service Definition (Scope):**

Self-directed community supports and employment are services that support the member in developing and maintaining independence and community integration. These services must be identified in the member's service plan developed by the member's case manager. Services may include payment for social skills development, career placement, vocational planning, and independent daily living activity skill development. The outcome of this service is to maintain integrated living in the community or to sustain competitive employment at or above the minimum wage in an integrated setting in the general workforce, in a job that meets personal and career goals.

Federal financial participation is not claimed for incentive payments, subsidies, or unrelated vocational training expenses such as the following: 1) incentive payments made to an employer to encourage or subsidize the employer's participation in supported employment; or 2) payments that are passed through to users of supported employment services.

Transportation may be covered for members from their place of residence and the employment site as a component of this service and the cost may be included in the rate.

The following are examples of supports a member can purchase to help the member live and work in the community:

- o Career counseling
- o Career preparation skills development
- o Cleaning skills development
- o Cooking skills development
- o Grooming skills development
- o Job hunting and career placement
- o Personal and home skills development
- o Safety and emergency preparedness skills development
- o Self-direction and self-advocacy skills development
- o Social skills development training
- o Supports to attend social activities
- o Supports to maintain a job
- o Time and money management
- o Training on use of medical equipment
- o Utilization of public transportation skills development
- o Work place personal assistance

Participants (or guardians) who have chosen the self-direction program must be willing to take on the responsibility of employee supervision and training. Participants or their guardians must review all time cards to ensure accuracy and work with their case manager and ISB to budget services. If a participant is not satisfied with the work of their employee, they have full authority to terminate them as a provider of services.

These services are limited to additional services not otherwise covered under the state plan, including EPSDT, but consistent with waiver objectives of avoiding institutionalization.

**Specify applicable (if any) limits on the amount, frequency, or duration of this service:**

Community support and employment services must be identified on the individual budget plan. The individual budget limit will be based on the member's authorized service plan and the need for the services available to be converted to the CCO budget. The AIDS/HIV waiver allows for the following waiver services to be converted to create a CCO budget:

1. Adult Day Care
2. Attendant Care(unskilled).
3. Home-delivered meals.
4. Home Maintenance Support service.

**5. Respite**

Once authorized in the monthly CCO budget, the member must use the budget to get their assessed needs met. It is the responsibility of the member's case manager or community based case manager to monitor the member's CCO use to assure that the member is using the budget to get their service needs met.

Self-Directed Community Support and Employment do not include, or duplicate services provided via the Rehabilitation Act of 1973 or IDEA.

Members enrolled in the waiver have access to Iowa Medicaid's Waiver to Iowa Administrative Code (IAC) option. Waivers to IAC cannot be requested for Federal requirements or state law. Members needing additional services in order to ensure health, safety, or other issues can request Waivers to IAC. The request must substantiate the exceptional need and also address why no other Medicaid or waiver service can address the issue. Decisions regarding Waivers to IAC requests are approved by the Department of Health and Human Services director.

**Service Delivery Method** (*check each that applies*):

- ☒ **Participant-directed as specified in Appendix E**  
☐ **Provider managed**  
☐ **Remote/via Telehealth**

**Specify whether the service may be provided by** (*check each that applies*):

- ☒ **Legally Responsible Person**  
☒ **Relative**  
☒ **Legal Guardian**

**Provider Specifications:**

Provider Category	Provider Type Title
Agency	Agency
Individual	Individual

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service****Service Type: Other Service****Service Name: Self Directed Community Support and Employment****Provider Category:**

Agency

**Provider Type:**

Agency

**Provider Qualifications****License** (*specify*):
**Certificate** (*specify*):
**Other Standard** (*specify*):

Members who elect the consumer choices option may choose to purchase self-directed community supports and employment. Providers must have current liability and workers' compensation coverage as required by law.

All personnel providing self-directed community supports and employment shall:

(1) Be at least 18 years of age.

- (2) Be able to communicate successfully with the member.
- (3) Not be the recipient of respite services paid through home- and community-based services on behalf of a member who receives home- and community-based services.
- (4) Not be the recipient of respite services paid through the consumer choices option on behalf of a member who receives the consumer choices option.
- d. The provider of individual-directed goods and services shall:
- (1) Prepare timecards or invoices approved by the department that identify what services were provided and the time when services were provided.
- (2) Submit invoices and time sheets to the financial management service no later than 30 calendar days from the date when the last service in the billing period was provided. Payment shall not be made if invoices and time sheets are received after this 30-day period.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

The member, Financial Management System (FMS) Provider and Iowa Department of Health and Human Services are responsible for the verification of provider qualifications. The member verifies that employees hired have the skills and training needed to provide direct services. The FMS is responsible for the employer tasks such as completing employee background checks, verify employee citizenship or aliens status, and assuring wages are within the Department of Labor standards. The Department verifies the employee criminal and abuse background checks.

**Frequency of Verification:**

Verification of qualifications occurs at the time of initial use by a member in the CCO program

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service**

**Service Type: Other Service**

**Service Name: Self Directed Community Support and Employment**

**Provider Category:**

Individual

**Provider Type:**

Individual

**Provider Qualifications****License (specify):**

**Certificate (specify):**

**Other Standard (specify):**

Members who elect the consumer choices option may choose to purchase self-directed community supports and employment. Providers must have current liability and workers' compensation coverage as required by law.

All personnel providing self-directed community supports and employment shall:

- (1) Be at least 18 years of age.
- (2) Be able to communicate successfully with the member.
- (3) Not be the recipient of respite services paid through home- and community-based services on behalf of a member who receives home- and community-based services.
- (4) Not be the recipient of respite services paid through the consumer choices option on behalf of a member who receives the consumer choices option.

d. The provider of individual-directed goods and services shall:

- (1) Prepare timecards or invoices approved by the department that identify what services were provided and the time when services were provided.
- (2) Submit invoices and time sheets to the financial management service no later than 30 calendar days from the date when

the last service in the billing period was provided. Payment shall not be made if invoices and time sheets are received after this 30-day period.

### Verification of Provider Qualifications

#### Entity Responsible for Verification:

The member, Financial Management System (FMS) Provider and Iowa Department of Health and Human Services are responsible for the verification of provider qualifications. The member verifies that employees hired have the skills and training needed to provide direct services. The FMS is responsible for the employer tasks such as completing employee background checks, verify employee citizenship or aliens status, and assuring wages are within the Department of Labor standards. The Department verifies the employee criminal and abuse background checks.

#### Frequency of Verification:

Verification of qualifications occurs at the time of initial use by a member in the CCO program

## Appendix C: Participant Services

### C-1/C-3: Service Specification

State laws, regulations and policies referenced in the specification are readily available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

#### Service Type:

Other Service

As provided in 42 CFR §440.180(b)(9), the State requests the authority to provide the following additional service not specified in statute.

#### Service Title:

Skilled Attendant Care

#### HCBS Taxonomy:

##### Category 1:

08 Home-Based Services

##### Sub-Category 1:

08030 personal care

##### Category 2:

##### Sub-Category 2:

##### Category 3:

##### Sub-Category 3:

##### Category 4:

##### Sub-Category 4:

#### Service Definition (Scope):

Service activities performed to help a person with self-care tasks which the person would typically do independently if able. This service may be provided in a private residence or in Assisted Living.

Skilled Attendant Care activities may include helping the person with any of the following skilled services while under the supervision of a licensed nurse or licensed therapist working under the direction of a physician:

- 1) Tube feedings of person unable to eat solid foods.
- 2) Intravenous therapy administered by a registered nurse.

- 3) Parenteral injections required more than once a week.
- 4) Catheterizations, continuing care of indwelling catheters, and changing of Foley catheters when required.
- 5) Respiratory care, including inhalation therapy, tracheotomy care, and ventilator.
- 6) Care of decubiti and other ulcerated areas, noting and reporting to the nurse or therapist.
- 7) Rehabilitation services, including but not limited to bowel and bladder training, range of motion exercises, ambulation training, restorative nursing services, reteaching activities of daily living, reality orientation, reminiscing therapy, re-motivation, and behavior modification.
- 8) Colostomy care.
- 9) Care of out-of-control medical conditions, including brittle diabetes and comfort care of terminal conditions.
- 10) Postsurgical care.
- 11) Monitoring medications requiring close supervision due to fluctuating physical or psychological conditions (e.g., antihypertensive, digitalis preparations, mood-altering or psychotropic drugs, or narcotics).
- 12) Preparing and monitoring response to therapeutic diets.
- 13) Recording and reporting changes in vital signs to the nurse or therapist.

Skilled Attendant Care is not skilled nursing care but is provided by a lay person who has been trained to provide the specific service needed by the person. The licensed nurse or therapist shall retain accountability for actions that are delegated. The licensed nurse or therapist shall ensure appropriate assessment, planning, implementation, and evaluation. A licensed nurse or therapist is responsible for overseeing the care of the waiver enrollee but is not the service provider. The cost of the supervision is provided under state plan funding and is not provided under the waiver.

Skilled Attendant Care is a separate and distinct service from Home Health and Nursing. Covered service activities must be essential to the health, safety, and welfare of the person.

Services may be provided in the absence of a parent or guardian if the parent or guardian has given advance direction for the service provision.

The person, parent, guardian, or attorney in fact under a durable power of attorney for health care shall be responsible for selecting the provider who will provide Attendant Care services and will provide training and supervision to the Attendant Care provider. The person, parent, guardian, or attorney in fact under a durable power of attorney for health care shall also determine the components of Attendant Care services to be provided.

The person-centered service plan will address how the person's needs are met. Services must be authorized in the person-centered service plan and monitored by the case manager.

These services are limited to additional services not otherwise covered under the state plan, but consistent with waiver objectives of avoiding institutionalization.

**Specify applicable (if any) limits on the amount, frequency, or duration of this service:**

A unit of service is 15 minutes billed in whole units. The upper limits for allowable provider types are published in the Iowa Administrative Code. The rates are subject to change on a yearly basis.

Skilled Attendant care may be provided to a recipient of in-home health related care services, but not at the same time. The licensed nurse or therapist shall make on-site supervisory visits every two weeks with the provider present.

Excluded services and costs. Services, activities, costs, and time that are not covered include the following (not an exclusive list):

- (1) Any activity related to supervising a person. Only direct services are billable.
- (2) Any activity that the person is able to perform
- (3) Costs of food
- (4) Costs for the supervision of skilled services by the nurse or therapist. The supervising nurse or therapist may be paid from private insurance, Medicare, or other third-party payment sources, or may be paid as another Medicaid service, including early and periodic screening, diagnosis, and treatment services.
- (5) Exercise that does not require skilled services
- (6) Parenting or childcare for or on behalf of the person
- (7) Reminders and cueing
- (8) Services provided simultaneously with any other similar service regardless of funding source, including other waiver services and state supplementary assistance in-home health-related care services
- (9) Transportation costs
- (10) Wait times for any activity



The person's case manager is responsible for oversight to avoid duplication of services and to assure state plan services are appropriately authorized in the person's person-centered service plan as needed. The first line of prevention of duplicative billing for similar types of services is the person's case manager. The case manager is responsible for the authorization and monitoring of services in a person's service plan. If the case manager authorizes similar services, they are responsible for ensuring that the services are delivered as ordered. The IoWANS system generates a review report to assist the case manager. The report identifies all services that are billed for a specific time period (ex. one month). The case manager can view the service billed to the person, the amount of the service billed, and the provider. The case manager can compare what is billed by the provider to what is ordered in the service plan.

Persons enrolled in the waiver have access to Iowa's Waiver of Administrative Rules (WoAR) option. WoARs can be requested but cannot be requested for Federal requirements or state law. Persons needing additional services to ensure health, safety, or other issues can request WoARs. The request must substantiate the exceptional need and also address why no other Medicaid or waiver service can address the issue. Decisions regarding WoAR requests are approved by the Department of Health and Human Services director.

**Service Delivery Method** (*check each that applies*):

- ☒ Participant-directed as specified in Appendix E
- ☒ Provider managed
- ☐ Remote/via Telehealth

**Specify whether the service may be provided by** (*check each that applies*):

- ☒ Legally Responsible Person
- ☒ Relative
- ☒ Legal Guardian

**Provider Specifications:**

Provider Category	Provider Type Title
Agency	Home Care Provider
Agency	Community Action Agency
Agency	Adult Day Care service providers
Agency	Area Agency on Aging
Agency	Home Health Agency
Agency	Community Businesses
Agency	Assisted living programs
Agency	Supported Community Living Providers

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Skilled Attendant Care**

**Provider Category:**

Agency

**Provider Type:**

Home Care Provider

**Provider Qualifications**

**License** (*specify*):

**Certificate** (*specify*):

Agencies authorized to provide similar services through a contract with the department of public health (IDPH) for local public health services. The agency must provide a current IDPH local public health services contract number.

**Other Standard (specify):**

Providers must be:

1. At least 18 years of age.
2. Qualified by training or experience to carry out the member's plan of care pursuant to the department-approved case plan or individual comprehensive plan.
3. Not the recipient of respite services paid through home- and community-based services on behalf of a member who receives home- and community-based services.

The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

The CDAC provider must enter into an agreement with the member receiving services, such that there is a plan to provide medically necessary and approved CDAC services to the member on a recurring basis within the parameters of the service plan, CDAC agreement, and provider standards.

For skilled CDAC, the service activities may include helping the member with any of the following skilled services under the supervision of a licensed nurse or licensed therapist working under the direction of a physician. The licensed nurse or therapist shall retain accountability for actions that are delegated. The licensed nurse or therapist shall ensure appropriate assessment, planning, implementation, and evaluation. The licensed nurse or therapist shall make on-site supervisory visits every two weeks with the provider present. The consumer-directed attendant care provider shall complete Form 470-4389, Consumer-Directed Attendant Care (CDAC) Service Record, for each day of service. The service activities shall not include parenting or child care for or on behalf of the member or on behalf of the provider. The member, parent, guardian, or attorney in fact under a durable power of attorney for health care and the provider shall complete, sign, and date Form 470-3372, HCBS Consumer-Directed Attendant Care Agreement. A copy of the completed agreement shall be attached to the service plan and kept in the member's records. If the member has a guardian or attorney in fact under a durable power of attorney for health care, the care plan shall address how consumer-directed attendant care services will be monitored to ensure the member's needs are being adequately met. If the guardian or attorney in fact is the service provider, the service plan shall address how the service worker or case manager shall oversee service provision

**Verification of Provider Qualifications**

**Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every five years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Skilled Attendant Care**

**Provider Category:**

Agency

**Provider Type:**

Community Action Agency

**Provider Qualifications**

**License (specify):**

**Certificate (specify):**

**Other Standard (specify):**

Community action agencies designated in Iowa Code section 216A.93 and governed by a board of directors in accordance with Iowa Code 216A.94. Community action agencies:

- (1) Plan and implement strategies to alleviate the conditions of poverty and encourage self-sufficiency for citizens in its service area and in Iowa.
- (2) Obtain and administer assistance from available sources on a common or cooperative basis, in an attempt to provide additional opportunities to low-income persons.
- (3) Establish effective procedures by which the concerned low-income persons and area residents may influence the community action programs affecting them by providing for methods of participation in the implementation of the community action programs and by providing technical support to assist persons to secure assistance available from public and private sources.
- (4) Encourage and support self-help, volunteer, business, labor, and other groups, and organizations to assist public officials and agencies in supporting a community action program.

For this service, the department does not have specific standards for subcontracts or providers regarding training, age limitations, experience, or education. Contracting agencies are responsible for ensuring that the contractor is qualified and reliable. Case managers are responsible for monitoring service provision to ensure services are provided in a safe and effective manner.

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age or older. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

For Skilled Attendant Care, the service activities may include helping the person with skilled services under the supervision of a licensed nurse or licensed therapist working under the direction of a physician. The licensed nurse or therapist shall retain accountability for actions that are delegated. The licensed nurse or therapist shall ensure appropriate assessment, planning, implementation, and evaluation. The licensed nurse or therapist shall make on-site supervisory visits every two weeks with the provider present.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

#### **Verification of Provider Qualifications**

##### **Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### **Frequency of Verification:**

Every five years

## **Appendix C: Participant Services**

### **C-1/C-3: Provider Specifications for Service**

**Service Type: Other Service**

**Service Name: Skilled Attendant Care**

#### **Provider Category:**

Agency

#### **Provider Type:**

Adult Day Care service providers

**Provider Qualifications****License (specify):****Certificate (specify):**

Adult Day Care Providers certified by the Iowa Department of Inspections and Appeals under Iowa Administrative Code 481.

**Other Standard (specify):**

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age or older. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

For Skilled Attendant Care, the service activities may include helping the person with skilled services under the supervision of a licensed nurse or licensed therapist working under the direction of a physician. The licensed nurse or therapist shall retain accountability for actions that are delegated. The licensed nurse or therapist shall ensure appropriate assessment, planning, implementation, and evaluation. The licensed nurse or therapist shall make on-site supervisory visits every two weeks with the provider present.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

**Appendix C: Participant Services****C-1/C-3: Provider Specifications for Service**

**Service Type: Other Service**

**Service Name: Skilled Attendant Care**

**Provider Category:**

Agency

**Provider Type:**

Area Agency on Aging

**Provider Qualifications****License (specify):****Certificate (specify):****Other Standard (specify):**

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age or older. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

For Skilled Attendant Care, the service activities may include helping the person with skilled services under the supervision of a licensed nurse or licensed therapist working under the direction of a physician. The licensed nurse or therapist shall retain accountability for actions that are delegated. The licensed nurse or therapist shall ensure appropriate assessment, planning, implementation, and evaluation. The licensed nurse or therapist shall make on-site supervisory visits every two weeks with the provider present.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Skilled Attendant Care**

#### Provider Category:

Agency

#### Provider Type:

Home Health Agency

#### Provider Qualifications

##### License (specify):

##### Certificate (specify):

Home health agencies certified to participate in the Medicare program (Title XVII of the Social Security Act sections 1861(o) and 1891), and, unless exempted under Iowa Administrative Code, have submitted a surety bond.

##### Other Standard (specify):

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age or older. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

For Skilled Attendant Care, the service activities may include helping the person with skilled services under the supervision of a licensed nurse or licensed therapist working under the direction of a physician. The licensed nurse or therapist shall retain accountability for actions that are delegated. The licensed nurse or therapist shall ensure appropriate assessment, planning, implementation, and evaluation. The licensed nurse or therapist shall make on-site supervisory visits every two weeks with the provider present.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every 5 years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Skilled Attendant Care**

#### Provider Category:

Agency

#### Provider Type:

Community Businesses

#### Provider Qualifications

##### License (specify):

Community businesses that have all necessary licenses and permits to operate in conformity with federal, state, and local laws and regulations, including Iowa Code Chapter 490, and that submit verification of current liability and workers' compensation insurance.

##### Certificate (specify):

##### Other Standard (specify):

Community businesses that are engaged in the provision of personal care services must submit verification of current liability and workers' compensation coverage.

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age or older. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

For Skilled Attendant Care, the service activities may include helping the person with skilled services under the supervision of a licensed nurse or licensed therapist working under the direction of a physician. The licensed nurse or therapist shall retain accountability for actions that are delegated. The licensed nurse or therapist shall ensure appropriate assessment, planning, implementation, and evaluation. The licensed nurse or therapist shall make on-site supervisory visits every two

weeks with the provider present.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every five years

## Appendix C: Participant Services

### C-1/C-3: Provider Specifications for Service

**Service Type: Other Service**

**Service Name: Skilled Attendant Care**

#### Provider Category:

Agency

#### Provider Type:

Assisted living programs

#### Provider Qualifications

##### License (specify):

##### Certificate (specify):

Assisted Living programs certified by the Iowa Department of Inspections and Appeals under Iowa Administrative Code 481.

##### Other Standard (specify):

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age or older. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

For Skilled Attendant Care, the service activities may include helping the person with skilled services under the supervision of a licensed nurse or licensed therapist working under the direction of a physician. The licensed nurse or therapist shall retain accountability for actions that are delegated. The licensed nurse or therapist shall ensure appropriate assessment, planning, implementation, and evaluation. The licensed nurse or therapist shall make on-site supervisory visits every two weeks with the provider present.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

#### Verification of Provider Qualifications

##### Entity Responsible for Verification:

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

##### Frequency of Verification:

Every 5 years

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**Appendix C: Participant Services**

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**C-1/C-3: Provider Specifications for Service**

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**Service Type: Other Service****Service Name: Skilled Attendant Care**

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**Provider Category:**

Agency

**Provider Type:**

Supported Community Living Providers

**Provider Qualifications****License (specify):****Certificate (specify):**

Providers certified by the Department's Home and Community Based Services Quality Oversight Unit to provide Supported Community Living in accordance with Iowa Administrative Code 441.

**Other Standard (specify):**

Providers must:

- (1) Ensure services are rendered by a person who is 18 years of age or older. People who are 16 or 17 years old may provide services if employed and supervised by an enrolled HCBS provider.
- (2) Be qualified by training or experience to carry out the person's service plan pursuant to the department-approved service planning process.
- (3) Not be the recipient of Respite services paid through home- and community-based services on behalf of a person who receives home- and community-based services.
- (4) Go through a criminal and adult/child abuse background check prior to enrollment. A provider may be disenrolled if an individual is convicted of any criminal activity or has a founded abuse record. The agency is responsible for ensuring that criminal background and abuse registry checks are conducted prior to direct service provision.

For Skilled Attendant Care, the service activities may include helping the person with skilled services under the supervision of a licensed nurse or licensed therapist working under the direction of a physician. The licensed nurse or therapist shall retain accountability for actions that are delegated. The licensed nurse or therapist shall ensure appropriate assessment, planning, implementation, and evaluation. The licensed nurse or therapist shall make on-site supervisory visits every two weeks with the provider present.

The service activities shall not include parenting or childcare for or on behalf of the person or on behalf of the provider.

Providers delivering services are required to have each of their staff involved in direct service complete training commensurate with the diagnoses and needs of the persons served.

**Verification of Provider Qualifications****Entity Responsible for Verification:**

Iowa Department of Health and Human Services, Iowa Medicaid, Provider Services Unit

**Frequency of Verification:**

Every 5 years

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**Appendix C: Participant Services**

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**C-1: Summary of Services Covered (2 of 2)**



**b. Provision of Case Management Services to Waiver Participants.** Indicate how case management is furnished to waiver participants (*select one*):

- ☐ **Not applicable** - Case management is not furnished as a distinct activity to waiver participants.
- ☒ **Applicable** - Case management is furnished as a distinct activity to waiver participants.

*Check each that applies:*

- ☐ **As a waiver service defined in Appendix C-3.** *Do not complete item C-1-c.*
- ☐ **As a Medicaid state plan service under section 1915(i) of the Act (HCBS as a State Plan Option).** *Complete item C-1-c.*
- ☐ **As a Medicaid state plan service under section 1915(g)(1) of the Act (Targeted Case Management).** *Complete item C-1-c.*
- ☒ **As an administrative activity.** *Complete item C-1-c.*
- ☐ **As a primary care case management system service under a concurrent managed care authority.** *Complete item C-1-c.*
- ☐ **As a Medicaid state plan service under section 1945 and/or section 1945A of the Act (Health Homes Comprehensive Care Management).** *Complete item C-1-c.*

**c. Delivery of Case Management Services.** Specify the entity or entities that conduct case management functions on behalf of waiver participants and the requirements for their training on the HCBS settings regulation and person-centered planning requirements:

#### FFS

Case managers provide case management services for members enrolled in the State's §1915(c) AIDS/HIV waiver. Services are reimbursed through an administrative function of HHS.

All individuals providing case management services have knowledge of community alternatives for the target populations and the full range of long-term care resources, as well as specialized knowledge of the conditions and functional limitations of the target populations served, and of the individual members to whom they are assigned.

#### MCO

MCO community-based case managers provide case management services to all members receiving HCBS. MCOs ensure ease of access and responsiveness for each member to their community-based case manager during regular business hours and, at a minimum, the community-based case manager contacts members at least monthly, either in person or by phone, with an interval of at least fourteen calendar days between contacts.

All individuals providing community based case management services have knowledge of community alternatives for the target populations and the full range of long-term care resources, as well as specialized knowledge of the conditions and functional limitations of the target populations served, and of the individual members to whom they are assigned. MCOs are contractually required to ensure the delivery of services in a conflict free manner consistent with Balancing Incentive Program requirements. HHS approves and monitors all MCO policies and procedures to ensure compliance.

**d. Remote/Telehealth Delivery of Waiver Services.** Specify whether each waiver service that is specified in Appendix C-1/C-3 can be delivered remotely/via telehealth.

Service
Counseling

1. Will any in-person visits be required?

- ☐ Yes.
- ☒ No.

2. By checking each box below, the state assures that it will address the following when delivering the service remotely/via telehealth.

- ☒ **The remote service will be delivered in a way that respects privacy of the individual especially in instances of toileting, dressing, etc. *Explain:***

Services delivered via telehealth will be delivered in a setting/location that protects the waiver participants privacy and therefore not permitted to be delivered in settings such as bathrooms.

The model requires informed consent by member and/or legal representative, as well as clear definitions within the person-centered service plan. The remote Support Professionals must:

- Respect and always maintain the individual's privacy, including when the person is in settings typically used by the public.
- Respect and always maintain the individual's privacy, including when scheduled or intermittent/as-needed support includes responding to an individual's health, safety, and other support needs for personal cares.
- Only use cameras in bedrooms or bathrooms when the IDT has identified a specific support need in the person-centered service plan and the member, and their legal representative has given informed consent.

- ☒ **How the telehealth service delivery will facilitate community integration. *Explain:***

The use of telehealth can assist individuals to live more independently or support a safe transition to independent living while enhancing their self-advocacy skills and increase opportunities for participating in the community.

- ☒ **How the telehealth will ensure the successful delivery of services for individuals who need hands on assistance/physical assistance, including whether the service can be rendered without someone who is physically present or is separated from the individual. *Explain:***

The use of remote supports and telehealth are not meant to replace the in-person supports for those individuals who require hands on or physical assistance. Individuals may receive counseling in person or via telehealth.

- ☒ **How the state will support individuals who need assistance with using the technology required for telehealth delivery of the service. *Explain:***

The state works closely with the agency providers to develop and provide training and other resources on the delivery of HCBS. The state will continue to support individuals receiving HCBS through the established service monitoring activities of the Case Managers and Community-Based Case Managers, the quality oversight activities of the HCBS QIO and providing technical assistance, information and additional resources as the need is identified.

- ☒ **How the telehealth will ensure the health and safety of an individual. *Explain:***

The individual's case manager or community-based case manager is responsible for monitoring the services in the person-centered service plan which includes at a minimum monthly contact with the individual or their representative and visiting individuals in their place of residence on a quarterly basis. The HCBS QIO and the MCOs also provide oversight of service delivery through the quality monitoring and oversight of the HCBS providers. Providers must have written policy and procedures approved by the Iowa Medicaid Quality Improvement Organization (QIO) HCBS unit that defines emergency situations and details. How remote and backup staff will respond to each. Examples include:

- Fire, medical crises, stranger in the home, violence between individuals and any other situation that appears to threaten the health or welfare of the individual.
- Emergency response drills must be carried out once per quarter per shift in each home equipped with and capable of utilizing remote supports.
- Documentation of the drills must be available for review upon request.
- When used to replace in-person direct support service delivery, the professional delivering HCBS via telehealth shall generate service documentation on each individual for the period when services are provided.

## Appendix C: Participant Services

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### C-2: General Service Specifications (1 of 3)

**a. Criminal History and/or Background Investigations.** Specify the state's policies concerning the conduct of criminal history and/or background investigations of individuals who provide waiver services (select one):

- ☐ **No. Criminal history and/or background investigations are not required.**
- ☒ **Yes. Criminal history and/or background investigations are required.**

Specify: (a) the types of positions (e.g., personal assistants, attendants) for which such investigations must be conducted; (b) the scope of such investigations (e.g., state, national); and, (c) the process for ensuring that mandatory investigations have been conducted. State laws, regulations and policies referenced in this description are available to CMS upon request through the Medicaid or the operating agency (if applicable):

Pursuant to Iowa Code 135C. 33(5)(a)(1) and (5)(a)(3), prospective employees of all of the following, if the provider is regulated by the state or receives any state or federal funding must complete child abuse, dependent adult abuse and criminal background screenings before employment of a prospective staff member who will provide care for a participant:

1. An employee of a home maintenance support, home health aide, home care aide, adult day care services, nursing or other provider of in-home services if the employee provides direct services to consumers; and
2. An employee who provides direct services to consumers under a federal home and community-based services waiver.

Iowa Code 249A.29 provides the scope of the above provider background screening:

1. For purposes of this section and section 249A.30 unless the context otherwise requires:
  - a. "Member" means an individual approved by the department to receive services under a waiver.
  - b. "Provider" means an agency certified by the department to provide services under a waiver.
  - c. "Waiver" means a home and community-based services waiver approved by the federal government and implemented under the medical assistance program.
2. If a person is being considered by a provider for employment involving direct responsibility for a member (individual approved by the department to receive services under a waiver) or with access to a member when the member is alone, and if the person has been convicted of a crime or has a record of founded child or dependent adult abuse, the department shall perform an evaluation to determine whether the crime or founded abuse warrants prohibition of employment by the provider. The department [(Department of Health and Human Services)] shall conduct criminal and child and dependent adult abuse records checks of the person in this state and may conduct these checks in other states. The records checks and evaluations required by this section shall be performed in accordance with procedures adopted for this purpose by the department.
3. If the department determines that a person employed by a provider has committed a crime or has a record of founded abuse, the department shall perform an evaluation to determine whether prohibition of the person's employment is warranted. In an evaluation, the department shall consider the nature and seriousness of the crime or founded abuse in relation to the position sought or held, the time elapsed since the commission of the crime or founded abuse, the circumstances under which the crime or founded abuse was committed, the degree of rehabilitation, the likelihood that the person will commit the crime or founded abuse again, and the number of crimes or founded abuses committed by the person involved. The department may permit a person who is evaluated to be employed or to continue to be employed by the provider if the person complies with the department's conditions relating to the employment, which may include completion of additional training.
4. If the department determines that the person has committed a crime or has a record of founded abuse that warrants prohibition of employment, the person shall not be employed by a provider.

As part of the provider's self-assessment process, they are required to have a quality improvement process in place to monitor their compliance with the criminal background checks. The provider agency is responsible for completing the required waiver to perform the criminal background check and submitting to the Department of Public Safety who conducts the check. The data and other information developed by the provider in the areas of discovery, remediation, and improvement of criminal background checks are available to the Department upon request. Iowa Medicaid will assure that criminal background checks have been completed through quality improvement activities on a random sampling of providers, focused onsite reviews and during the full on-site reviews conducted every 5 years. During each of these review processes, the HCBS Quality Oversight unit reviews the provider's quality data collected by the provider to measure compliance with the criminal background checks. The HCBS Quality oversight unit also reviews a random sample of personnel files to verify the background checks are present in the file and reflects the provider's quality review.

The State HCBS Quality Oversight Unit reviews agency personnel records during provider site visits to ensure screenings have been completed. There are four types of provider site visits where agency personnel records are reviewed; periodic, certification, focused and targeted. At a minimum all providers have a periodic review conducted every five years. Providers of respite services require a certification review that is conducted every one to three years, depending on the results of the review. Focused reviews occurs annually for a select group of providers randomly selected to review a quality topic selected by the Department. Targeted reviews are conducted as needed based on complaints received by the Department or specific provider quality concerns identified.

Criminal history and abuse registry screenings are rerun anytime there is a complaint related to additional criminal charges against a provider, and the Program Integrity Unit runs all individual providers against a Department of Corrections file on a quarterly basis. HHS also completes any evaluation needed for screenings returned with records or charges. Background checks only include Iowa unless the applicant is a resident of another state providing services in Iowa.

MCOs are contractually required to assure that all persons, whether they are employees, agents, subcontractors, or anyone acting for or on behalf of the MCO, are properly licensed, certified, or accredited as required under applicable state law and the Iowa Administrative Code. The Contractor shall provide standards for service providers who are not otherwise licensed, certified, or accredited under state law or the Iowa Administrative Code.

**b. Abuse Registry Screening.** Specify whether the state requires the screening of individuals who provide waiver services through a state-maintained abuse registry (select one):

- ☐ **No. The state does not conduct abuse registry screening.**
- ☒ **Yes. The state maintains an abuse registry and requires the screening of individuals through this registry.**

Specify: (a) the entity (entities) responsible for maintaining the abuse registry; (b) the types of positions for which abuse registry screenings must be conducted; (c) the process for ensuring that mandatory screenings have been conducted; and (d) the process for ensuring continuity of care for a waiver participant whose service provider was added to the abuse registry. State laws, regulations and policies referenced in this description are available to CMS upon request through the Medicaid agency or the operating agency (if applicable):

Pursuant to Iowa Code 135C. 33(5)(a)(1) and (5)(a)(3), prospective employees of all of the following, if the provider is regulated by the state or receives any state or federal funding must complete child abuse, dependent adult abuse and criminal background screenings before employment of a prospective staff member who will provide care for a participant:

1. An employee of a home maintenance support, home care aide, adult day services, or other provider of in-home services if the employee provides direct services to members; and
2. An employee who provides direct services to members under a federal home and community-based services waiver.

Iowa Code 249A.29 provides the scope of the above provider background screening:

1. For purposes of this section and section 249A.30 unless the context otherwise requires:
  - a. "Member" means an individual approved by the department to receive services under a waiver.
  - b. "Provider" means an agency certified by the department to provide services under a waiver.
  - c. "Waiver" means a home and community-based services waiver approved by the federal government and implemented under the medical assistance program.
2. If a person is being considered by a provider for employment involving direct responsibility for a member (individual approved by the department to receive services under a waiver) or with access to a member when the member is alone, and if the person has been convicted of a crime or has a record of founded child or dependent adult abuse, the department shall perform an evaluation to determine whether the crime or founded abuse warrants prohibition of employment by the provider. The department shall conduct criminal and child and dependent adult abuse records checks of the person in this state and may conduct these checks in other states. The records checks and evaluations required by this section shall be performed in accordance with procedures adopted for this purpose by the department.
3. If the department determines that a person employed by a provider has committed a crime or has a record of founded abuse, the department shall perform an evaluation to determine whether prohibition of the person's employment is warranted. In an evaluation, the department shall consider the nature and seriousness of the crime or founded abuse in relation to the position sought or held, the time elapsed since the commission of the crime or founded abuse, the circumstances under which the crime or founded abuse was committed, the degree of rehabilitation, the likelihood that the person will commit the crime or founded abuse again, and the number of crimes or founded abuses committed by the person involved. The department may permit a person who is evaluated to be employed or to continue to be employed by the provider if the person complies with the department's conditions relating to the employment, which may include completion of additional training.
4. If the department determines that the person has committed a crime or has a record of founded abuse that warrants prohibition of employment, the person shall not be employed by a provider.

When a caregiver has been identified as unable to work, the member's case manager will assist the member with arranging back up supports as identified in their service plan until alternative service plan providers can be identified and authorized.

All employees that provide direct services under the Consumer Choices Option (CCO) under this waiver are required to complete child and dependent adult abuse background checks prior to employment with a member. The Fiscal Management Services (FMS) provider completes the child and dependent adult abuse background checks and the employee will not pay for any services to the member prior to the completion of the checks.

The Iowa Department of Health and Human Services maintains the Central Abuse Registry. All child and dependent adult abuse checks are conducted by the HHS unit responsible for the intake, investigation, and finding of child and dependent adult abuse. The provider agency is responsible for completing the required abuse screening form and submitting it to HHS to conduct the screening. Providers are required to complete the child and dependent adult abuse background checks of all staff that provides direct services to waiver members prior to employment. Providers are required to have written policies and procedures for the screening of personnel for child and dependent adult abuse checks prior to employment. As part of the provider's self-assessment process, they are required to have a quality improvement process in place to monitor their compliance with the child and dependent adult abuse checks. The data and other information developed by the provider in the areas of discovery, remediation, and improvement of child and dependent adult abuse checks are available to the Department upon request. The

Department will assure that the child and dependent adult abuse checks have been completed through the Department's quality improvement activities of random sampling of providers, focused onsite reviews, initial certification and periodic reviews and during the full on-site reviews conducted every 5 years.

The State HCBS Quality Assurance and Technical Assistance Unit reviews agency personnel records during provider site visits to ensure screenings have been completed. Screenings are rerun anytime there is a complaint related to additional criminal charges against a provider, and the Program Integrity Unit runs all individual providers against a Department of Corrections file on a quarterly basis. HHS also completes any evaluation needed for screenings returned with records or charges. MCOs are also required to ensure that all required screening is conducted for providers who are not employees of a provider agency or licensed/accredited by a board that conducts background checks (i.e., non-agency affiliated self-direction service providers). HHS retains final authority to determine if an employee may work in a particular program.

## Appendix C: Participant Services

### C-2: General Service Specifications (2 of 3)

**Note:** Required information from this page is contained in response to C-5.

## Appendix C: Participant Services

### C-2: General Service Specifications (3 of 3)

**d. Provision of Personal Care or Similar Services by Legally Responsible Individuals.** A legally responsible individual is any person who has a duty under state law or regulations to care for another person (e.g., the parent (biological or adoptive) of a minor child or the guardian of a minor child who must provide care to the child). At the option of the state and under extraordinary circumstances specified by the state, payment may be made to a legally responsible individual for the provision of personal care or similar services. *Select one:*

- ☐ **No. The state does not make payment to legally responsible individuals for furnishing personal care or similar services.**
- ☒ **Yes. The state makes payment to legally responsible individuals for furnishing personal care or similar services when they are qualified to provide the services.**

Specify: (a) the types of legally responsible individuals who may be paid to furnish such services and the services they may provide; (b) the method for determining that the amount of personal care or similar services provided by a legally responsible individual is "*extraordinary care*", exceeding the ordinary care that would be provided to a person without a disability or chronic illness of the same age, and which are necessary to assure the health and welfare of the participant and avoid institutionalization; (c) the state policies to determine that the provision of services by a legally responsible individual is in the best interest of the participant; (d) the state processes to ensure that legally responsible individuals who have decision-making authority over the selection of waiver service providers use substituted judgement on behalf of the individual; (e) any limitations on the circumstances under which payment will be authorized or the amount of personal care or similar services for which payment may be made; (f) any additional safeguards the state implements when legally responsible individuals provide personal care or similar services; and, (g) the procedures that are used to implement required state oversight, such as ensuring that payments are made only for services rendered. *Also, specify in Appendix C-1/C-3 the personal care or similar services for which payment may be made to legally responsible individuals under the state policies specified here.*

A person who is legally responsible for a member may provide services to a waiver member. This applies to spouses, guardians of their adult children or of other adults, age 18 or older, for whom they have been legally appointed as the guardian. Parents and guardians of members aged 17 and younger may also be paid providers of service. The person who is legally responsible for a member may be an employee or subcontractor of a Attendant Care agency, Home Maintenance Support agency, or a self-directed personal care employee under the Consumer Choices Option (CCO) program. When the legally responsible person is the Attendant Care provider or CCO employee, the service planning team determines the need for and the types of activities to be provided by the legally responsible person. This includes reviewing if the needed services are “extraordinary.” Any services which are activities that a legally responsible individual would ordinarily perform in the household on behalf of a person without a disability or chronic illness of the same age and are not necessary to assure the health and welfare of the member and to avoid institutionalization would not be considered extraordinary. If the legally responsible person is an employee through an Attendant Care agency or CCO, the legally responsible person must have the skills needed to provide the services to the member. In many situations, the member requests the legally responsible person to provide services, as the legally responsible person knows the member and their needs best. In other circumstances, there are no other qualified providers available when the service is needed or a lack of staff in the area to provide the service.

Self-directed services allowed to be provided by a legally responsible person under CCO include unskilled Attendant Care and Home Maintenance Support services.

Through the person-centered planning process, the comprehensive service plan is developed. If the member has a legally responsible person who is also their service provider, the care plan will address how the HHS case manager or MCO community-based case manager will oversee the service provision to ensure care is delivered in the best interest of the member and that the legally responsible person is using substituted judgment on behalf of the individual.

The rate of pay and the care provided by the legally responsible person is identified and authorized in the member’s plan of care that is authorized and monitored by a HHS case manager or MCO community-based case manager. Service plans are monitored to assure that authorized services are received. For fee-for-service members, the State completes post utilization audits on waiver providers verifying those services rendered match the service plan and claim process. In addition, information on paid claims for fee-for-service members are available in IoWANS for review. The IoWANS system compares the submitted claims to the services authorized in the plan of care prior to payment. The claim will not be paid if there is a discrepancy between the amount billed and the rate of pay authorized in the plan. MCOs are responsible for ensuring the provision of services by a legally responsible individual is in the best interest of the member and that payments are made only for services rendered. All participants must participate in a training program prior to assuming self-direction, and MCOs provide ongoing training upon request and/or if it is determined a participant needs additional training. MCOs monitor the quality-of-service delivery and the health, safety and welfare of members participating in self-direction, including implementation of the back-up plan. If problems are identified, a self-assessment is completed to determine what additional supports, if any, could be made available. MCOs must ensure payments are made only for services rendered through the development and implementation of a contractually required program integrity plan. The HHS maintains oversight of the MCO program integrity plans and responsibility for overall quality monitoring and oversight.

**e. Other State Policies Concerning Payment for Waiver Services Furnished by Relatives/Legal Guardians.** Specify state policies concerning making payment to relatives/legal guardians for the provision of waiver services over and above the policies addressed in Item C-2-d. *Select one:*

- ☐ The state does not make payment to relatives/legal guardians for furnishing waiver services.
- ☒ The state makes payment to relatives/legal guardians under specific circumstances and only when the relative/guardian is qualified to furnish services.

Specify the types of relatives/legal guardians to whom payment may be made, the services for which payment may be made, the specific circumstances under which payment is made, and the method of determining that such circumstances apply. Also specify any limitations on the amount of services that may be furnished by a relative or legal guardian, and any additional safeguards the state implements when relatives/legal guardians provide waiver services. Specify the state policies to determine that the provision of services by a relative/legal guardian is in the



best interests of the individual. When the relative/legal guardian has decision-making authority over the selection of providers of waiver services, specify the state's process for ensuring that the relative/legal guardian uses substituted judgement on behalf of the individual. Specify the procedures that are employed to ensure that payments are made only for services rendered. *Also, specify in Appendix C-1/C-3 each waiver service for which payment may be made to relatives/legal guardians.*

A member's relative or legal representative may provide services to a member. This applies to spouses, guardians of their adult children or of other adults, age 18 or older, for whom they have been legally appointed as the guardian. Parents and guardians of members aged 17 and younger may also be paid providers of service. Payments may be made to any relative, or in some circumstances, a legal representative of the member and meets the minimum age requirements for service provision. Legal representative means a person, including an attorney, who is authorized by law to act on behalf of the medical assistance program member. Legal representatives may be paid providers for members aged 18 and over for whom they act as the legal representative. The legal representative may be an employee under the CCO program, or an employee hired by a provider agency. When the legal representative is the CCO provider, the case manager or community-based case manager and interdisciplinary team determine the need for and the types of activities provided by the legal representative. If the legal representative is an employee of an enrolled provider agency, they may be paid by the enrolled provider as an employee of the provider. This would include employees of Adult Day Care or Attendant Care agencies. Medicaid payments are being made to the enrolled provider and not directly to the legal representative as is done with CCO employees. The provider must assure the legal representative has the skills needed to provide the services to the member. It is the responsibility of the enrolled provider to recruit, train, and supervise the legal representative same as all employees.

Services allowed to be self-directed under CCO include Attendant Care, Home Delivered Meals, Individual Goods and Services, Self-Directed Community Support and Employment, Independent Support Broker, and Respite.

The rate of pay and the care provided by the legally responsible person is identified and authorized in the member's service plan that is authorized and monitored by the member's case manager or community-based case manager.

The HHS case manager or community-based case manager are responsible to monitor service plans and assure the services authorized in the member's plan are received. In addition, information on paid claims of fee-for-service members is available in IoWANS for review. The IoWANS System compares the submitted claim to the services authorized in the service plan prior to payment. The claim will not be paid if there is a discrepancy between the amount billed and the rate authorized in the plan. The state also completes post utilization audits on waiver providers verifying those services rendered match the service plan and claim process. This applies to provider agencies and services paid under CCO. MCOs are required to adhere to all state policies, procedures, and regulations regarding payment to legal guardians, as outlined in this section.

Through the person-centered planning process, the comprehensive service plan is developed. If the member has a legally responsible person who is also their service provider, the care plan will address how the HHS case manager or MCO community-based case manager will oversee the service provision to ensure care is delivered in the best interest of the member and that the legally responsible person is using substituted judgment on behalf of the individual.

- ☐ **Relatives/legal guardians may be paid for providing waiver services whenever the relative/legal guardian is qualified to provide services as specified in Appendix C-1/C-3.**

Specify the controls that are employed to ensure that payments are made only for services rendered.

- ☐ **Other policy.**

Specify:

**f. Open Enrollment of Providers.** Specify the processes that are employed to assure that all willing and qualified providers have the opportunity to enroll as waiver service providers as provided in 42 CFR § 431.51:

Iowa Medicaid providers will be responsible for providing services to fee-for-service members. The Iowa Medicaid Provider Services Department markets provider enrollment for Iowa Medicaid. Potential providers may access an application on line through the website or by calling the provider services' phone number. The IME Provider Services Unit must respond in writing within five working days once a provider enrollment application is received, and must either accept the enrollment application and approve the provider as a Medicaid provider or request more information. In addition, waiver quality assurance staff and waiver program managers, as well as county and State service workers, case managers, market to qualified providers to enroll in Medicaid.

MCOs are responsible for oversight of their provider networks.

The State ensures that LTSS providers are given the opportunity for continued participation in the managed care networks by regularly monitoring the managed care organization provider network and evaluating rationales for not having providers in their networks. While the number of providers not contracted with all three managed care organizations is small, the rationale includes providers not accepting the "floor" rates determined by the State and wanting enhanced rates. The State additionally tracks on provider inquiries and complaints which includes complaints related to network access and credentialing.

**g. State Option to Provide HCBS in Acute Care Hospitals in accordance with Section 1902(h)(1) of the Act.** Specify whether the state chooses the option to provide waiver HCBS in acute care hospitals. *Select one:*

- ☒ **No, the state does not choose the option to provide HCBS in acute care hospitals.**
- ☐ **Yes, the state chooses the option to provide HCBS in acute care hospitals under the following conditions. By checking the boxes below, the state assures:**
- ☐ **The HCBS are provided to meet the needs of the individual that are not met through the provision of acute care hospital services;**
  - ☐ **The HCBS are in addition to, and may not substitute for, the services the acute care hospital is obligated to provide;**
  - ☐ **The HCBS must be identified in the individual's person-centered service plan; and**
  - ☐ **The HCBS will be used to ensure smooth transitions between acute care setting and community-based settings and to preserve the individual's functional abilities.**

*And specify:* (a) The 1915(c) HCBS in this waiver that can be provided by the 1915(c) HCBS provider that are not duplicative of services available in the acute care hospital setting; (b) How the 1915(c) HCBS will assist the individual in returning to the community; and (c) Whether there is any difference from the typically billed rate for these HCBS provided during a hospitalization. If yes, please specify the rate methodology in Appendix I-2-a.

## Appendix C: Participant Services

### Quality Improvement: Qualified Providers

*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: Qualified Providers

*The state demonstrates that it has designed and implemented an adequate system for assuring that all waiver services are provided by qualified providers.*

**i. Sub-Assurances:**

- a. Sub-Assurance:** *The state verifies that providers initially and continually meet required licensure and/or certification standards and adhere to other standards prior to their furnishing waiver services.*

**Performance Measures**

*For each performance measure the state will use to assess compliance with the statutory 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:**

**QP-a2: # and % of licensed/certified provider reenrollments verified against appropriate licensing/certification standards prior to continuing to furnish services**

**Numerator:** # of licensed/certified provider reenrollments verified against appropriate licensing/certification standards prior to continuing to furnish services.

**Denominator:** # of licensed/certified waiver provider re-enrollments

**Data Source** (Select one):

**Reports to State Medicaid Agency on delegated**

If 'Other' is selected, specify:

**Re-enrollment information out of IoWANS. All MCO HCBS providers must be re-enrolled as verified by the Iowa Medicaid Provider Services Unit every five years.**

<b>Responsible Party for data collection/generation</b> (check each that applies):	<b>Frequency of data collection/generation</b> (check each that applies):	<b>Sampling Approach</b> (check each that applies):
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input checked="" type="checkbox"/> 100% Review
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly	<input type="checkbox"/> Less than 100% Review
<input type="checkbox"/> Sub-State Entity	<input type="checkbox"/> Quarterly	<input type="checkbox"/> Representative Sample Confidence Interval = <div></div>
<input checked="" type="checkbox"/> Other Specify: <div>Contract entity</div>	<input type="checkbox"/> Annually	<input type="checkbox"/> Stratified Describe Group: <div></div>

	<input type="checkbox"/> Continuously and Ongoing	<input type="checkbox"/> Other Specify: <div></div>
	<input type="checkbox"/> Other Specify: <div></div>	

**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> ):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input checked="" type="checkbox"/> Other Specify: <div>Contract entity</div>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify: <div></div>

**Performance Measure:**

**QP-a1: Number and percent of newly enrolled waiver providers verified against the appropriate licensing or certification standards prior to furnishing services.**

**Numerator: # of newly enrolled waiver providers verified against appropriate licensing or certification standards prior to providing services Denominator: # of newly enrolled waiver providers required to be licensed or certified.**

**Data Source (Select one):**

**Other**

If 'Other' is selected, specify:

**Encounter data, claims data and enrollment information out of IoWANS. All MCO HCBS providers must be enrolled as verified by the Iowa Medicaid PS.**

<b>Responsible Party for</b>	<b>Frequency of data</b>	<b>Sampling Approach</b>
------------------------------	--------------------------	--------------------------

<b>data collection/generation</b> (check each that applies):	<b>collection/generation</b> (check each that applies):	(check each that applies):
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input checked="" type="checkbox"/> 100% Review
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly	<input type="checkbox"/> Less than 100% Review
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly	<input type="checkbox"/> Representative Sample Confidence Interval = <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>
<input checked="" type="checkbox"/> Other Specify: <div style="border: 1px solid black; padding: 2px; margin-top: 5px;">Contracted entity</div>	<input checked="" type="checkbox"/> Annually	<input type="checkbox"/> Stratified Describe Group: <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>
	<input checked="" type="checkbox"/> Continuously and Ongoing	<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>
	<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>	

**Data Aggregation and Analysis:**

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

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

**b. Sub-Assurance: The state monitors non-licensed/non-certified providers to assure adherence to waiver requirements.**

For each performance measure the state will use to assess compliance with the statutory 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:**

**QP-b1: Number and percent of non-licensed/noncertified providers that met waiver requirements prior to direct service delivery. Numerator: # of non-licensed/noncertified providers who met waiver requirements prior to service delivery; Denominator: # of non-licensed/noncertified providers enrolled providers.**

**Data Source** (Select one):

**Other**

If 'Other' is selected, specify:

**Enrollment information out of IoWANS. All MCO HCBS providers must be enrolled as verified by the Iowa Medicaid PS.**

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

		<input type="text"/>
<input checked="" type="checkbox"/> <b>Other</b> Specify:  <input type="text" value="Contracted entity"/>	<input type="checkbox"/> <b>Annually</b>	<input type="checkbox"/> <b>Stratified</b> Describe Group:  <input type="text"/>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>	<input type="checkbox"/> <b>Other</b> Specify:  <input type="text"/>
	<input type="checkbox"/> <b>Other</b> Specify:  <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>
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>
<input type="checkbox"/> <b>Other</b> Specify:  <input type="text"/>	<input type="checkbox"/> <b>Annually</b>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>
	<input type="checkbox"/> <b>Other</b> Specify:  <input type="text"/>

**Performance Measure:**

**QP-b2: Number and percent of Consumer Choice Option (CCO) providers that met waiver requirements prior to direct service delivery. Numerator: Number of CCO**

providers who met waiver requirements prior to service delivery; Denominator:  
Number of CCO enrolled providers.

Data Source (Select one):

**Other**

If 'Other' is selected, specify:

**Financial Management Services (FMS) provider data collection**

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):
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input checked="" type="checkbox"/> 100% Review
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly	<input type="checkbox"/> Less than 100% Review
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly	<input type="checkbox"/> Representative Sample Confidence Interval = <div></div>
<input checked="" type="checkbox"/> Other Specify: <div>FMS Provider</div>	<input type="checkbox"/> Annually	<input type="checkbox"/> Stratified Describe Group: <div></div>
	<input type="checkbox"/> Continuously and Ongoing	<input type="checkbox"/> Other Specify: <div></div>
	<input type="checkbox"/> Other Specify: <div></div>	

**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):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly



Responsible Party for data aggregation and analysis (check each that applies):	Frequency of data aggregation and analysis (check each that applies):
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>

**c. Sub-Assurance: The State implements its policies and procedures for verifying that provider training is conducted in accordance with state requirements and the approved waiver.**

For each performance measure the state will use to assess compliance with the statutory 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:**

**QP-c1: Number and percent of HCBS providers that meet training requirements as outlined in State regulations and the approved waiver. Numerator: # of HCBS providers that meet training requirements as outlined in State regulations and the approved waiver; Denominator: # of HCBS providers that had a certification or periodic quality assurance review.**

**Data Source (Select one):**

**Other**

If 'Other' is selected, specify:

**Provider's evidence of staff training and provider training policies. All certified and periodic reviews are conducted on a 5 year cycle; at the end of the cycle all providers are reviewed**

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):
<input type="checkbox"/> State Medicaid	<input type="checkbox"/> Weekly	<input checked="" type="checkbox"/> 100% Review

<b>Agency</b>		
<input type="checkbox"/> <b>Operating Agency</b>	<input checked="" type="checkbox"/> <b>Monthly</b>	<input type="checkbox"/> <b>Less than 100% Review</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input type="checkbox"/> <b>Quarterly</b>	<input type="checkbox"/> <b>Representative Sample</b> Confidence Interval = <div></div>
<input checked="" type="checkbox"/> <b>Other</b> Specify: <div>Contracted Entity</div>	<input type="checkbox"/> <b>Annually</b>	<input type="checkbox"/> <b>Stratified</b> Describe Group: <div></div>
	<input checked="" type="checkbox"/> <b>Continuously and Ongoing</b>	<input type="checkbox"/> <b>Other</b> Specify: <div></div>
	<input type="checkbox"/> <b>Other</b> Specify: <div></div>	

**Data Aggregation and Analysis:**

<b>Responsible Party for data aggregation and analysis (check each that applies):</b>	<b>Frequency of data aggregation and analysis (check each that applies):</b>
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>
<input type="checkbox"/> <b>Other</b> Specify: <div></div>	<input type="checkbox"/> <b>Annually</b>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>
	<input type="checkbox"/> <b>Other</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> ):
	Specify: <div style="border: 1px solid black; height: 30px; width: 100%;"></div>

- 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 Iowa Medicaid Provider Services unit is responsible for review of provider licensing, certification, background checks of relevant providers, and determining compliance with provider service and business requirements prior to initial enrollment and reenrollment.

All MCO providers must be enrolled as verified by Iowa Medicaid Provider Services.

The QIO, HCBS unit is responsible for reviewing provider records at a 100% level over a three-to-five-year cycle, depending on certification or accreditation. If it is discovered that providers are not adhering to provider training requirements, a corrective action plan is implemented. If corrective action attempts do not correct noncompliance, the provider is sanctioned for noncompliance and eventually disenrolled or terminated if noncompliance persists.

#### 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.

If it is discovered by Provider Services Unit during the review that the provider is not compliant in one of the enrollment and reenrollment state or federal provider requirements, the provider is required to correct deficiency prior to enrollment or reenrollment approval. Until the provider make these corrections, they are ineligible to provide services to waiver members. All MCO providers must be enrolled as verified by Iowa Medicaid Provider Services, so if the provider is no longer enrolled by Iowa Medicaid then that provider is no longer eligible to enroll with an MCO.

If it is discovered during QIO, HCBS Unit review that providers are not adhering to provider training requirements, a corrective action plan is implemented. If corrective action attempts do not correct noncompliance, the provider is sanctioned for noncompliance and eventually disenrolled or terminated if noncompliance persists.

General methods for problem correction at a systemic level include informational letters, provider trainings, collaboration with stakeholders and required changes in individual provider policy.

PMs QP-a1, QP-a2, QP-b1, QP-b2, discovery process includes reviewing the provider's qualifications prior to enrollment and upon reenrollment. Provider qualifications include ensuring that the provider is performing child and dependent adult abuse checks and criminal record checks in accordance with Code of Iowa 135C.33

<https://www.legis.iowa.gov/docs/code/2019/135C.33.pdf>, 441 Iowa Administrative Code 79.14

<https://www.legis.iowa.gov/docs/iac/chapter/441.79.pdf> and 441 IAC 119 <https://www.legis.iowa.gov/docs/iac/chapter/09-25-2019.441.119.pdf>

#### 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> ):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly

Responsible Party( <i>check each that applies</i> ):	Frequency of data aggregation and analysis ( <i>check each that applies</i> ):
<input checked="" type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; padding: 2px; width: 100%;">contracted entity and MC</div>	<input type="checkbox"/> <b>Annually</b>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>
	<input type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; height: 30px; width: 100%;"></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 Qualified Providers that are currently non-operational.

☒ **No**

☐ **Yes**

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

## Appendix C: Participant Services

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### C-3: Waiver Services Specifications

Section C-3 'Service Specifications' is incorporated into Section C-1 'Waiver Services.'

## Appendix C: Participant Services

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### C-4: Additional Limits on Amount of Waiver Services

**a. Additional Limits on Amount of Waiver Services.** Indicate whether the waiver employs any of the following additional limits on the amount of waiver services (*select one*).

☒ **Not applicable-** The state does not impose a limit on the amount of waiver services except as provided in Appendix C-3.

☐ **Applicable** - The state imposes additional limits on the amount of waiver services.

When a limit is employed, specify: (a) the waiver services to which the limit applies; (b) the basis of the limit, including its basis in historical expenditure/utilization patterns and, as applicable, the processes and methodologies that are used to determine the amount of the limit to which a participant's services are subject; (c) how the limit will be adjusted over the course of the waiver period; (d) provisions for adjusting or making exceptions to the limit based on participant health and welfare needs or other factors specified by the state; (e) the safeguards that are in effect when the amount of the limit is insufficient to meet a participant's needs; (f) how participants are notified of the amount of the limit. (*check each that applies*)

☐ **Limit(s) on Set(s) of Services.** There is a limit on the maximum dollar amount of waiver services that is authorized for one or more sets of services offered under the waiver.  
Furnish the information specified above.

- ☐ **Prospective Individual Budget Amount.** There is a limit on the maximum dollar amount of waiver services authorized for each specific participant.  
*Furnish the information specified above.*

- ☐ **Budget Limits by Level of Support.** Based on an assessment process and/or other factors, participants are assigned to funding levels that are limits on the maximum dollar amount of waiver services.  
*Furnish the information specified above.*

- ☐ **Other Type of Limit.** The state employs another type of limit.  
*Describe the limit and furnish the information specified above.*

## Appendix C: Participant Services

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### C-5: Home and Community-Based Settings

Explain how residential and non-residential settings in this waiver comply with federal HCB Settings requirements at 42 §§ CFR 441.301(c)(4)-(5) and associated CMS guidance. Include:

1. Description of the settings in which 1915(c) HCBS are recieved. (*Specify and describe the types of settings in which waiver services are received.*)

HCBS services can be provided in the following settings:

- Individual member's homes of any type (houses, apartments, condominiums, etc.).
- Members living in their family home of any type.
- Integrated community rental properties available to anyone within the community.
- Adult Day Care may occur in the member's home or in integrated community-based settings.

Provider-owned or controlled residential settings including:

- DIA licensed Residential Care Facility (RCF)
- DIA licensed Assisted Living Facility
- Host Home

In order to assess the settings identified above to ensure they met the HCBS settings requirements, Iowa Medicaid used their existing processes and enhanced, expanded, or created new processes and tools where gaps existed.

These processes include:

- Provider quality self-assessment, address collection, and attestation (form #470-4547)
- Quality oversight and review and specifically the SFY17-18 and SFY23 Focused Reviews completed by the QIO HCBS Unit
- Residential Assessments
- Settings Assessments

To ensure settings identified above continue to meet the HCBS settings requirements, Iowa Medicaid will use the following processes to assess HCBS settings for compliance with the Final Statewide Transition Plan (STP):

- Provider Quality Self-Assessment tool
- Quality oversight and review of non-residential settings completed by the QIO HCBS Unit.
- Residential Assessments – completed annually by case managers with each member receiving HCB services.

Additionally, a Residential Assessment will be completed with members within 30 days of moving to a new residence.

All residential settings where HCB services are provided must document the following in the member's service or treatment plan:

- The setting is integrated in and supports full access of individuals receiving Medicaid HCBS to the greater community, including opportunities to seek employment and work in competitive integrated settings, engage in community life, and receive services in the community, to the same degree of access as individuals not receiving Medicaid HCBS at 42 CFR §441.301(c)(4)(i) (entire criterion except for "control personal resources), and receive services in the community, like individuals without disabilities.
- The setting, to reside in, is selected by the individual from setting options including non-disability specific settings and an option for a private unit in a residential setting. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs, preferences, and for residential settings, resources available for room and board at 42 CFR §441.301(c)(4)(ii),
- Optimizes, but does not regiment, individual initiative, autonomy, and independence in making life choices, including but not limited to, daily activities, physical environment, and with whom to interact at 42 CFR §441.301(c)(4)(iv), and
- Facilitates individual choice regarding services and supports, and who provides them at 42 CFR §441.301(c)(4)(v).

Provider-owned or controlled residential settings:

Residential settings that are provider owned or provider controlled or operated including licensed Residential Care Facilities (RCF) for 16 or fewer persons must also document the following in the member's service or treatment plan:

- Individuals sharing units have a choice of roommate in that setting at 42 CFR §441.301(c)(4)(vi)(B)(2), and
- Individuals have the freedom and support to control their own schedules and activities at 42 CFR §441.301(c)(4)(vi)(C) (entire criterion except for "have access to food at any time").

HCBS services may not be provided in settings that are presumed to have institutional qualities and do not meet the rule's

requirements for home and community-based settings. These settings include those in a publicly or privately-owned facility that provide inpatient treatment, on the grounds of, or immediately adjacent to, a public institution; or that have the effect of isolating individuals receiving Medicaid-funded HCBS from the broader community of individuals not receiving Medicaid-funded HCBS.

2. Description of the means by which the state Medicaid agency ascertains that all waiver settings meet federal HCB Setting requirements, at the time of this submission and in the future as part of ongoing monitoring. *(Describe the process that the state will use to assess each setting including a detailed explanation of how the state will perform on-going monitoring across residential and non-residential settings in which waiver HCBS are received.)*

To assess the settings identified above to ensure they met the HCBS settings requirements, Iowa Medicaid uses existing processes and enhances, expands, or creates new processes and tools where gaps exist. These processes include:

- Provider quality self-assessment, address collection, and attestation (form #470-4547)
- Quality oversight and review and specifically the SFY17-18 and SFY23 Focused Reviews completed by the QIO HCBS Unit
- Residential Settings Assessments
- Non-Residential Settings Assessments To ensure settings identified above continue to meet the HCBS settings requirements, Iowa Medicaid will use the following processes to assess HCBS settings for ongoing compliance:
  - Provider Quality Self-Assessment tool
  - Quality oversight and review of non-residential settings completed by the QIO HCBS Unit.
  - Residential Assessments – completed annually by case managers with each member receiving HCB services. Additionally, a Residential Assessment will be completed with members within 30 days of moving to a new residence.

3. By checking each box below, the state assures that the process will ensure that each setting will meet each requirement:

- ☒ The setting is integrated in and supports full access of individuals receiving Medicaid HCBS to the greater community, including opportunities to seek employment and work in competitive integrated settings, engage in community life, control personal resources, and receive services in the community, to the same degree of access as individuals not receiving Medicaid HCBS.
- ☒ The setting is selected by the individual from among setting options including non-disability specific settings and an option for a private unit in a residential setting. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs, preferences, and, for residential settings, resources available for room and board. *(see Appendix D-1-d-ii)*
- ☒ Ensures an individual's rights of privacy, dignity and respect, and freedom from coercion and restraint.
- ☒ Optimizes, but does not regiment, individual initiative, autonomy, and independence in making life choices, including but not limited to, daily activities, physical environment, and with whom to interact.
- ☒ Facilitates individual choice regarding services and supports, and who provides them.
- ☒ Home and community-based settings do not include a nursing facility, an institution for mental diseases, an intermediate care facility for individuals with intellectual disabilities, a hospital; or any other locations that have qualities of an institutional setting.

**Provider-owned or controlled residential settings.** *(Specify whether the waiver includes provider-owned or controlled settings.)*

- ☐ No, the waiver does not include provider-owned or controlled settings.
- ☒ Yes, the waiver includes provider-owned or controlled settings. (By checking each box below, the state assures that each setting, in addition to meeting the above requirements, will meet the following additional conditions):
  - ☒ The unit or dwelling is a specific physical place that can be owned, rented, or occupied under a legally enforceable agreement by the individual receiving services, and the individual has, at a minimum, the same responsibilities and protections from eviction that tenants have under the landlord/tenant law of the state, county, city, or other designated entity. For settings in which landlord tenant laws do not apply, the

state must ensure that a lease, residency agreement or other form of written agreement will be in place for each HCBS participant, and that the document provides protections that address eviction processes and appeals comparable to those provided under the jurisdiction's landlord tenant law.

- ☒ Each individual has privacy in their sleeping or living unit:
  - ☒ Units have entrance doors lockable by the individual.
  - ☒ Only appropriate staff have keys to unit entrance doors.
  - ☒ Individuals sharing units have a choice of roommates in that setting.
  - ☒ Individuals have the freedom to furnish and decorate their sleeping or living units within the lease or other agreement.
- ☒ Individuals have the freedom and support to control their own schedules and activities.
- ☒ Individuals have access to food at any time.
- ☒ Individuals are able to have visitors of their choosing at any time.
- ☒ The setting is physically accessible to the individual.
- ☒ Any modification of these additional conditions for provider-owned or controlled settings, under § 441.301(c)(4)(vi)(A) through (D), must be supported by a specific assessed need and justified in the person-centered service plan(*see Appendix D-1-d-ii of this waiver application*).

## Appendix D: Participant-Centered Planning and Service Delivery

### D-1: Service Plan Development (1 of 8)

State Participant-Centered Service Plan Title:

Individual Service Plan

**a. Responsibility for Service Plan Development.** Per 42 CFR § 441.301(b)(2), specify who is responsible for the development of the service plan and the qualifications of these individuals. Given the importance of the role of the person-centered service plan in HCBS provision, the qualifications should include the training or competency requirements for the HCBS settings criteria and person-centered service plan development. (*Select each that applies*):

- ☐ Registered nurse, licensed to practice in the state
- ☐ Licensed practical or vocational nurse, acting within the scope of practice under state law
- ☐ Licensed physician (M.D. or D.O)
- ☐ Case Manager (qualifications specified in Appendix C-1/C-3)
- ☒ Case Manager (qualifications not specified in Appendix C-1/C-3).

*Specify qualifications:*



In order for an Agency to meet the requirements of 441 Iowa Administrative Code 24 for case management services, the Agency submits certification papers along with a provider application in order to be enrolled to provide case management. An Agency that is accredited through the Commission on Accreditation of Rehabilitation Facilities (CARF) for Case Management services must attach a current certification and most recent CARF survey report. Per 441 Iowa Administrative Code 24.1(225C), qualified case managers and supervisors are required to have the following qualifications: “(1) a bachelor’s degree with 30 semester hours or equivalent quarter hours in a human services field (including, but not limited to, psychology, social work, mental health counseling, marriage and family therapy, nursing, education, occupational therapy, and recreational therapy) and at least one year of experience in the delivery of services to the population groups that the person is hired as a case manager or case management supervisor to serve; or (2) an Iowa license to practice as a registered nurse and at least three years of experience in the delivery of services to the population group the person is hired as a case manager or case management supervisor to serve.

Health and Human Services Targeted Case Management (HHS TCM) qualifications include: graduation from an accredited four-year college or university; or the equivalent of four years of full-time technical work experience involving direct contact with people in overcoming their social, economic, psychological, or health problems; or an equivalent combination of education and experience substituting the equivalent of one year of full-time qualifying work experience for one year (thirty semester or equivalent hours) of the required education to a maximum substitution of four years.

#### MCO

MCO Community-Based Case Manager Qualifications. The MCO shall submit the required qualifications, experience and training of community-based case managers to the Department for approval. For members who choose to self-direct services through the Consumer Choices Option program, the community-based case manager shall have specific experience with self-direction and additional training regarding self-direction. The Department will not prescribe specific community-based case manager-to-member ratios that shall be maintained. However, the Department reserves the right to require the MCO to hire additional community-based case managers if it is determined, at the sole discretion of the Department, the MCO has insufficient community-based case management staff to properly and timely perform its obligations under the Contract.

All Case Managers are required to complete initial Case Manager certification modules posted on the HHS Learning Management System (LMS) within six months of hire and annually thereafter.

☐ **Social Worker**

*Specify qualifications:*

☐ **Other**

*Specify the individuals and their qualifications:*

## Appendix D: Participant-Centered Planning and Service Delivery

### D-1: Service Plan Development (2 of 8)

**b. Service Plan Development Safeguards.** Providers of HCBS for the individual, or those who have interest in or are employed by a provider of HCBS; are not permitted to have responsibility for service plan development except, at the option of the state, when providers are given responsibility to perform assessments and plans of care because such individuals are the only willing and qualified entity in a geographic area, and the state devises conflict of interest protections. *Select one:*

- ☒ Entities and/or individuals that have responsibility for service plan development may not provide other direct waiver services to the participant.
- ☐ Entities and/or individuals that have responsibility for service plan development may provide other direct waiver services to the participant. *Explain how the HCBS waiver service provider is the only willing and qualified entity in a geographic area who can develop the service plan:*

*(Complete only if the second option is selected)* The state has established the following safeguards to mitigate the potential for conflict of interest in service plan development. *By checking each box, the state attests to having a process in place to ensure:*

- ☐ Full disclosure to participants and assurance that participants are supported in exercising their right to free choice of providers and are provided information about the full range of waiver services, not just the services furnished by the entity that is responsible for the person-centered service plan development;
- ☐ An opportunity for the participant to dispute the state's assertion that there is not another entity or individual that is not that individual's provider to develop the person-centered service plan through a clear and accessible alternative dispute resolution process;
- ☐ Direct oversight of the process or periodic evaluation by a state agency;
- ☐ Restriction of the entity that develops the person-centered service plan from providing services without the direct approval of the state; and
- ☐ Requirement for the agency that develops the person-centered service plan to administratively separate the plan development function from the direct service provider functions.

## Appendix D: Participant-Centered Planning and Service Delivery

### D-1: Service Plan Development (3 of 8)

- c. Supporting the Participant in Service Plan Development.** Specify: (a) the supports and information that are made available to the participant (and/or family or legal representative, as appropriate) to direct and be actively engaged in the service plan development process and (b) the participant's authority to determine who is included in the process.

Information related to waiver services and general waiver descriptions are initially made available following receipt of a waiver application. Service plans are then developed with the member and an interdisciplinary team, regardless of delivery system. Teams often consist of the member and, if appropriate, their representative; case manager or community-based case manager; service providers; and other supporting persons selected by the member. During service plan development, the member and/or their representative is strongly encouraged to engage in an informed choice of services, and is offered a choice of institutional or HCBS. Planning is timely, occurs when convenient for the member, and is intended to reflect the member's cultural considerations. If the member chooses to self-direct services, an Independent Support Broker is provided to assist with budgeting and employer functions.

Iowa Medicaid Member Services Unit remains available at all times, during normal business hours, to answer questions and offer support to all Medicaid beneficiaries. The Iowa Medicaid remains available to answer questions and offer support. Further, the MSU distributes a quarterly newsletter in effort to continually educate participants about services and supports that are available but may not have been identified during the service plan development process.

The fee-for-service person-centered planning processes must:

- Include people chosen by the member;
- Include the use of team of professionals and non-professionals with adequate knowledge, training and expertise surrounding community living and person-centered service delivery;
- Allow the member to choose which team member shall serve as the lead and the member's main point of contact;
- Promote self-determination principles and actively engages the member;
- Provide necessary information and support to ensure that the member directs the process to the maximum extent possible, and is enabled to make informed choices and decisions;
- Be timely and occur at times and locations of convenience to the member;
- Reflect cultural considerations of the individual and provide information in plain language and in a manner that is accessible to individuals with disabilities and persons who are limited English proficient, consistent with 42 CFR 435.905(b);
- Include strategies for solving conflict or disagreement within the process, including clear conflict-of-interest guidelines for all planning participants;
- Offer informed choices to the member regarding the services and supports they receive and from whom;
- Include a method for the member to request updates to the plan as needed; and
- Record the alternative home and community-based settings that were considered by the member.

MCOs are contractually required to provide supports and information that encourage members to direct, and be actively engaged in, the service plan development process, and to ensure that members have the authority to determine who is included in the process. Specifically, MCO person-centered planning processes must:

- Include people chosen by the member;
- Include the use of team of professionals and non-professionals with adequate knowledge, training and expertise surrounding community living and person-centered service delivery;
- Allow the member to choose which team member shall serve as the lead and the member's main point of contact;
- Promote self-determination principles and actively engages the member;
- Provide necessary information and support to ensure that the member directs the process to the maximum extent possible, and is enabled to make informed choices and decisions;
- Be timely and occur at times and locations of convenience to the member;
- Reflect cultural considerations of the member and provide information in plain language and in a manner that is accessible to individuals with disabilities and persons who are limited English proficient, consistent with 42 CFR 435.905(b);
- Include strategies for solving conflict or disagreement within the process, including clear conflict-of-interest guidelines for all planning participants;
- Offer informed choices to the member regarding the services and supports they receive and from whom;
- Include a method for the member to request updates to the plan as needed; and
- Record the alternative home and community-based settings that were considered by the member.

## Appendix D: Participant-Centered Planning and Service Delivery

### D-1: Service Plan Development (4 of 8)

- d. i. **Service Plan Development Process.** In four pages or less, describe the process that is used to develop the participant-

centered service plan, including: (a) who develops the plan, who participates in the process, and the timing of the plan; (b) the types of assessments that are conducted to support the service plan development process, including securing information about participant needs, preferences and goals, and health status; (c) how the participant is informed of the services that are available under the waiver; (d) how the plan development process ensures that the service plan addresses participant goals, needs (including health care needs), and preferences; (e) how waiver and other services are coordinated; (f) how the plan development process provides for the assignment of responsibilities to implement and monitor the plan; (g) how and when the plan is updated, including when the participant's needs changed; (h) how the participant engages in and/or directs the planning process; and (i) how the state documents consent of the person-centered service plan from the waiver participant or their legal representative. State laws, regulations, and policies cited that affect the service plan development process are available to CMS upon request through the Medicaid agency or the operating agency (if applicable):

For fee-for-service member's service plans are developed by the member; case manager; and an interdisciplinary team. Planning meetings are scheduled at times and locations convenient for the member. The service plan must be completed prior to services being delivered and annually thereafter, or whenever there is a significant change in the member's situation or condition. The case manager receives the assessment and level of care determination from medical services. A summary of the assessment becomes part of the service plan. The case manager uses information gathered from the assessment and then works with the member to identify individual and family strengths, needs, capacities, preferences and desired outcomes and health status and risk factors. This is used to identify the scope of services needed.

Note: For both FFS and managed care enrollees, the types of assessments used are identified in Appendix B-6-e.

The case manager informs the member of all available non-Medicaid and Medicaid services including waiver services. There are waiver informational brochures available to share with members and their parents/guardians. Brochures are available at each of the HHS county offices. Information is also available on the Iowa Medicaid and MCO websites. The brochures include information on eligibility, service descriptions, and the application process. Once a member begins the enrollment process and has a case manager or community-based case manager assigned, a more detailed review of services and providers that are available in the area occurs as part of the planning process for developing a member's plan of care.

The case manager will also discuss with the member the self-direction option and give the member the option of self-directing services available. The member and the interdisciplinary team choose services and supports that meet the member's needs and preferences, which become part of the service plan. Service plans must:

- Reflect that the setting in which the member resides is chosen by the member;
- Reflect the member's strengths and preferences;
- Reflect the clinical and support needs as identified through the needs assessment;
- Include individually identified goals and desired outcomes which are observable and measurable;
- Include the interventions and supports needed to meet member's goals and incremental action steps as appropriate;
- Reflect the services and supports, both paid and unpaid, that will assist the member to achieve identified goals, the frequency of services and the providers of those services and supports, including natural supports;
- Include the names of providers responsible for carrying out the interventions or supports including who is responsible for implementing each goal on the plan and the timeframes for each service;
- Include the identified activities to encourage the member to make choices, to experience a sense of achievement, and to modify or continue participation in the service plan;
- Include a description of any restrictions on the member's rights, including the need for the restriction and a plan to restore the rights (for this purpose, rights include maintenance of personal funds and self-administration of medications);
- Reflect risk factors and measures in place to minimize them, including individualized back-up plans and strategies when needed;
- Include a plan for emergencies;
- Be understandable to the member receiving services and supports, and the individuals important in supporting him or her;
- Identify the individual and/or entity responsible for monitoring the plan;
- Be finalized and agreed to, with the informed consent of the member in writing, and signed by all individuals and providers responsible for its implementation;
- Be distributed to the member and other people involved in the plan;
- Indicate if the member has elected to self-direct services and, as applicable, which services the member elects to self-direct; and
- Prevent the provision of unnecessary or inappropriate services and supports.

The case manager will be responsible for coordination, monitoring and overseeing the implementation of the service plan including Medicaid and non-Medicaid services. If a member chooses to self-direct, the member with the help of a case manager identifies who will be providing Independent Support Broker Services.

For MCO members, the MCO is responsible to designate Community Based Case Managers who oversee and implement

all case management activities, including service plans.

Service plans are developed through a person-centered planning process led by the member, with MCO participation, and representatives included in a participatory role as needed and/or defined by the member. Planning meetings are scheduled at times and locations convenient for the individual. A team is established to identify services based on the member's needs and desires, as well as availability and appropriateness of services. The team is also responsible for identifying an emergency backup support and crisis response system to address problems or issues arising when support services are interrupted or delayed, or when the member's needs change. Service plans are completed prior to services being delivered, and are reevaluated at least annually, whenever there is a significant change in the member's situation or condition, or at a member's request.

In accordance with 42 CFR 441.301 and 441 Iowa Administrative Code Chapters 90.5(1)b and 83, MCOs must ensure the service plan reflects the services and supports that are important for the member to meet the needs identified through the needs assessment, as well as what is important to the member with regard to preferences for the delivery of such services and supports. The service plan must reflect the member's needs and preferences and how those needs will be met by a combination of covered services and available community supports. The service planning process must address the full array of medical and non-medical services and supports provided by the MCO and available in the community to ensure the maximum degree of integration and the best possible health outcomes and member satisfaction. Services plans must:

- Reflect that the setting in which the member resides is chosen by the member;
- Reflect the member's strengths and preferences;
- Reflect the clinical and support needs as identified through the needs assessment;
- Include individually identified goals and desired outcomes which are observable and measurable;
- Include the interventions and supports needed to meet member goals and incremental action steps as appropriate;
- Reflect the services and supports, both paid and unpaid, that will assist the individual to achieve identified goals, the frequency of services and the providers of those services and supports, including natural supports;
- Include the names of providers responsible for carrying out the interventions or supports including who is responsible for implementing each goal on the plan and the timeframes for each service;
- Include the identified activities to encourage the member to make choices, to experience a sense of achievement, and to modify or continue participation in the service plan;
- Include a description of any restrictions on the member's rights, including the need for the restriction and a plan to restore the rights (for this purpose, rights include maintenance of personal funds and self-administration of medications);
- Reflect risk factors and measures in place to minimize them, including individualized back-up plans and strategies when needed;
- Include a plan for emergencies;
- Be understandable to the member receiving services and supports, and the individuals important in supporting him or her;
- Identify the individual and/or entity responsible for monitoring the plan;
- Be finalized and agreed to, with the informed consent of the member in writing, and signed by all individuals and providers responsible for its implementation;
- Be distributed to the member and other people involved in the plan;
- Indicate if the member has elected to self-direct services and, as applicable, which services the participant elects to self-direct; and
- Prevent the provision of unnecessary or inappropriate services and supports.

If a member chooses to self-direct, the member with the help of a Community Based case manager identifies who will be providing Independent Support Broker Services.

MCO members have appeal rights, including access to a State Fair Hearing after exhausting the MCO appeal process. Members can continue services while an appeal decision is pending, when the conditions of 42 CFR 438.420 are met. MCOs are contractually required to implement a comprehensive strategy to ensure a seamless transition of services during program implementation. Further, MCOs are required to develop and maintain, subject to HHS approval, a strategy and timeline within which all waiver members will receive an in-person visit from appropriate MCO staff and an updated needs assessment and service plan. Services may not be reduced, modified or terminated in the absence of an up-to-date assessment of needs that supports the reduction, modification or termination. Changes to these must receive HHS prior approval.

ii. HCBS Settings Requirements for the Service Plan. *By checking these boxes, the state assures that the following will be*

*included in the service plan:*

- ☒ The setting options are identified and documented in the person-centered service plan and are based on the individual's needs, preferences, and, for residential settings, resources available for room and board.
- ☒ For provider owned or controlled settings, any modification of the additional conditions under 42 CFR § 441.301(c)(4)(vi)(A) through (D) must be supported by a specific assessed need and justified in the person-centered service plan and the following will be documented in the person-centered service plan:
  - ☒ A specific and individualized assessed need for the modification.
  - ☒ Positive interventions and supports used prior to any modifications to the person-centered service plan.
  - ☒ Less intrusive methods of meeting the need that have been tried but did not work.
  - ☒ A clear description of the condition that is directly proportionate to the specific assessed need.
  - ☒ Regular collection and review of data to measure the ongoing effectiveness of the modification.
  - ☒ Established time limits for periodic reviews to determine if the modification is still necessary or can be terminated.
  - ☒ Informed consent of the individual.
  - ☒ An assurance that interventions and supports will cause no harm to the individual.

## Appendix D: Participant-Centered Planning and Service Delivery

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### D-1: Service Plan Development (5 of 8)

**e. Risk Assessment and Mitigation.** Specify how potential risks to the participant are assessed during the service plan development process and how strategies to mitigate risk are incorporated into the service plan, subject to participant needs and preferences. In addition, describe how the service plan development process addresses backup plans and the arrangements that are used for backup.

During the evaluation/reevaluation of level of care, risks are assessed for FFS members by a case manager and for MCO members by their respective CBCM, using the assessment tools designated in B-6e. The assessment becomes part of the service plan, and any risks are addressed as part of the service plan development process. The comprehensive service plan must identify an emergency backup support and crisis response system to address problems or issues arising when support services are interrupted or delayed or the member's needs change. In addition, providers of applicable services shall provide for emergency backup staff. All service plans must include a plan for emergencies and identification of the supports available to the participant in an emergency.

Emergencies are those situations for which no approved individual program plan exists and which, if not addressed, may result in injury or harm to the member or other persons or significant amounts of property damage. The service plan must identify an emergency backup support and crisis response system to address problems or issues arising when support services are interrupted or delayed or the member's needs change. In addition, providers of applicable services shall provide for emergency backup staff.

Emergency plans are developed on the following basis:

- Providers must provide for emergency, back-up staff in applicable services.
- Interdisciplinary teams must identify in the service plan, as appropriate for the individual member health and safety issues based on information gathered prior to the team meeting, including a risk assessment. This information is incorporated into the service plan.
- The team identifies an emergency backup support and crisis response system to address problems or issues arising when support services are interrupted or delayed, or the member's needs change.

Other providers may be listed on the service plan as source of back up as well. All members choosing the self-direction option will sign an individual risk agreement that permits the member to acknowledge and accept certain responsibilities for addressing risks.

Iowa Medicaid has developed a computer program named Institutional and Waiver Authorization and Narrative System (IoWANS) to support HCBS programs. For fee-for-service members, this system assists the Medicaid Agency and the case manager with tracking information, and monitoring and approving the service plan.

Through IoWANS case manager authorizes service and service payments on behalf of the member. There are certain points in IoWANS process that require contacting the designated HHS central office personnel. The case manager is responsible for the development the service plan and the service plan is authorized through IoWANS, which is the Medicaid Agency. (Refer to appendix A and H for IoWANS system processes.)

MCOs have processes to ensure the necessary risk assessments and mitigation plans are completed and made available to all parties.

## Appendix D: Participant-Centered Planning and Service Delivery

### D-1: Service Plan Development (6 of 8)

- f. Informed Choice of Providers.** Describe how participants are assisted in obtaining information about and selecting from among qualified providers of the waiver services in the service plan.



While information about qualified and accessible providers is available to members through the Iowa Medicaid website, MCO website, and/or MCO member services call center, the case manager, community-based case manager first identifies providers to the member and their interdisciplinary team during the person-centered service planning process. Members are encouraged to meet with the available providers before making a selection. Members are not restricted to choosing providers within their community. Information about qualified and accessible providers is also available to members through their case manager, community-based case manager, Iowa Medicaid website, and/or MCO website. If an MCO is unable to provide services to a particular member using contract providers, the MCO is required to adequately and timely cover these services for that member using non-contract providers, for as long as the MCO's provider network is unable to provide them.

The MCOs are responsible for authorizing services for out-of-network care when they do not have an in-network provider available within the contractually required time, distance, and appointment availability standards. The MCO is responsible for assisting the member in locating an out-of-network provider, authorizing the service and assisting the member in accessing the service. The MCO will also assist with assuring continuity of care when an in-network provider becomes available. To ensure robust provider networks for members to choose from, MCOs are not permitted to close provider networks until adequacy is fully demonstrated to, and approved by, the State. Further, members will be permitted to change MCOs to the extent their provider does not ultimately contract with their desired MCO. Finally, MCOs are required to submit to the State on a regular basis provider network reports including, but not limited to network geo-access reports, 24-hour availability audit reports, provider-credentialing reports, subcontractor compliance summary reports, and provider helpline performance reports.

## Appendix D: Participant-Centered Planning and Service Delivery

### D-1: Service Plan Development (7 of 8)

**g. Process for Making Service Plan Subject to the Approval of the Medicaid Agency.** Describe the process by which the service plan is made subject to the approval of the Medicaid agency in accordance with 42 CFR § 441.301(b)(1)(i):

HHS has developed a computer program named the Institutional and Waiver Authorization and Narrative System (IoWANS) to support HCBS programs. This system assists HHS with tracking information, monitoring, and approving service plans for fee-for-service members. (Refer to appendix A and H for IoWANS processes.) On a monthly basis, the Iowa Medicaid QIO MSU conducts a desk review of service plans for a statistically valid sample of the enrolled population. The selection size for the service plan reviews are detailed in the QIS of appendix D. The results of the service plan reviews are reported to CMS as part of Iowa's performance measures. The State retains oversight of the MCO service plan process through a variety of monitoring and oversight strategies as described in Appendix D – Quality Improvement: Service Plan section. IoWANS will be utilized for fee-for-service members and quality data for managed care members will be provided by the MCOs.

**Interdisciplinary Team (IDT) Ride Alongs.** To ensure MCO IDTs follow a Person-centered process, service planning meetings are individualized to address Member-specific needs, and result in person-centered service plans based on historical information, member's needs, desires and outcomes. Ride Alongs are conducted by the HCBS QIO at a rate that is statistically valid and agreed upon by the Agency.

Ride Along duties include but are not limited to:

- i. Ensure a representative sample of Waiver Case Managers from each MCO is interviewed each quarter at a 95% confidence level;
- ii. Observe the service planning process during the IDT meetings;
- iii. Record observations on Agency-approved forms;
- iv. Provide training and support to the IDT in the moment;
- v. Provide recommendations to the Agency for quality improvement and/or corrective actions addressing areas of noncompliance; and
- vi. Report findings to the Agency on a monthly basis.

## Appendix D: Participant-Centered Planning and Service Delivery

### D-1: Service Plan Development (8 of 8)

**h. Service Plan Review and Update.** The service plan is subject to at least annual periodic review and update, when the individual's circumstances or needs change significantly, or at the request of the individual, to assess the appropriateness and adequacy of the services as participant needs change. Specify the minimum schedule for the review and update of the service plan:

- ☐ Every three months or more frequently when necessary
- ☐ Every six months or more frequently when necessary
- ☒ Every twelve months or more frequently when necessary
- ☐ Other schedule

*Specify the other schedule:*

**i. Maintenance of Service Plan Forms.** Written copies or electronic facsimiles of service plans are maintained for a minimum period of 3 years as required by 45 CFR § 92.42. Service plans are maintained by the following (*check each that applies*):

- ☒ Medicaid agency
- ☐ Operating agency
- ☐ Case manager
- ☒ Other

*Specify:*

Case managers and MCO community-based case managers are responsible to maintain copies of the service plans for a minimum of 5 years from the date when a claim was submitted for payment.

Service plans are stored in a central location, the Iowa Medicaid Provider Access Portal (IMPA), managed by Iowa Medicaid. The Case managers and MCO community-based case managers are required to upload member's service plans to IMPA as well as store them within their own case management systems. Service Plans must be made available to all entities acting on behalf of Medicaid.

For FFS members, IoWANS also stores the authorized service plan information related to service, provider, units, rates, and timeframe of authorization.

## Appendix D: Participant-Centered Planning and Service Delivery

### D-2: Service Plan Implementation and Monitoring

**a. Service Plan Implementation and Monitoring.** Specify: (a) the entity (entities) responsible for monitoring the implementation of the service plan, participant health and welfare, and adherence to the HCBS settings requirements under 42 CFR §§ 441.301(c)(4)-(5); (b) the monitoring and follow-up method(s) that are used; and, (c) the frequency with which monitoring is performed.

HCBS waiver services must be accessed at least once every calendar quarter by the member.

As part of HCBS waiver enrollment, case management is required for each participant, regardless of delivery system. Following the first three months, the Case Managers must complete at least one contact per month with the individual or their authorized representative in order to establish access to services and to ensure the authorized services are provided as outlined in the participant's service plan to ensure the participant's health, safety and welfare. This contact may be face-to-face, virtual, or via telehealth. Written communication does not constitute contact unless there are extenuating circumstances outlined in the enrollee's individualized service plan (ISP).

- If the individual has been diagnosed with an Intellectual and/or Developmental Disability, Case Managers must complete at least one, in-home, face-to-face contact every other month
- For those who are not diagnosed with Intellectual and/or Developmental Disability, the Case Manager must complete at least one, in-home, face-to-face contact every three months.

#### FFS

The case managers are responsible for monitoring the implementation of the service plan and the health and welfare of fee-for-service members, including:

- Monitoring service utilization including access and use of non-waiver services including health services.
- Participating in the development and approval of the service plan in coordination with the interdisciplinary team at least annually or as needs change. If services have not been meeting member needs, the plan is changed to meet those needs. The effectiveness of the emergency backup plan is also addressed as the service plan is developed.

The member is encouraged during the time of the service plan development to call the case manager if there are any problems with either Medicaid or non-Medicaid services. The case manager will then follow up to solve any problems. Monitoring service utilization includes verifying that:

- The member used the waiver service at least once a calendar quarter.
- The services were provided in accordance with the plan.
- The member is receiving the level of service needed.

The IoWANS system is also used to assist with tracking information, monitoring services, and assuring services were provided to fee-for-service members. If the member is not receiving services according to the plan or not receiving the services needed, the member and other interdisciplinary team members and providers are contacted immediately.

The HCBS specialists (of the HCBS QIO Unit) monitor the how member health and welfare is safeguarded, the degree of service plan implementation; and the degree of interdisciplinary team involvement of the case manager during the HCBS Quality Assurance review. Members are asked about their choice of provider, whether or not the services are meeting their needs, whether staff and case manager are respecting their choice and dignity, if they are satisfied with their services and providers, or whether they feel safe where they receive services and live.

HCBS specialists also review the effectiveness of emergency back-up and crisis plans. These components are monitored through quality oversight reviews of providers, member satisfaction surveys, complaint investigation, and critical incident report follow-up. All providers are reviewed at least once over a five-year cycle and members are surveyed at a 95% confidence level. Information about monitoring results are compiled by the HCBS Quality Assurance and Technical Assistance Unit on a quarterly basis. This information is used to make recommendations for improvements and training.

The Iowa Medicaid MSU also conducts quality assurance reviews of member service plans at a 95% confidence level. These reviews focus on the plan development, implementation, monitoring, and documentation that is completed by the case manager. All service plans reviewed are assessed for member participation, whether the member needs are accurately identified and addressed, the effectiveness of risk assessments and crisis plans, member access to waiver and non-waiver services, as well as coordination across providers to best serve the member's needs. Information about monitoring results are compiled by the Iowa Medicaid MSU on a quarterly basis. This information is used to make recommendations for improvements and training.

#### MCO

MCOs are responsible for monitoring the implementation of the service plans at a 95% confidence level. These reviews focus on the plan development, implementation, monitoring, and documentation that is completed by the case manager. All service plans reviewed are assessed for member participation, whether the member needs are accurately identified and addressed, the effectiveness of risk assessments and crisis plans, member access to waiver and non-waiver services, as

well as coordination across providers to best serve the member's needs including access to waiver and non-waiver services, the quality of service delivery including access and use of non-waiver services including health services, and the health, safety and welfare of members and choice of service providers. Information about monitoring results are compiled and reported by the MCO on a quarterly basis. After the initiation of services identified in a member's service plan, MCOs monitor the provision of services, to confirm services have been initiated and are being provided on an ongoing basis as authorized in the service plan. At minimum, the case manager must contact members within five business days of scheduled initiation of services to confirm that services are being provided and that member's needs are being met. At a minimum, the community-based case manager shall contact 1915(c) HCBS waiver members at least monthly either in person or by telephone with an interval of at least fourteen (14) calendar days between contacts.

MCOs also identify and address service gaps and ensure that back-up plans are being implemented and are functioning effectively. If problems are identified, MCOs complete a self-assessment to determine what additional supports, if any, could be made available to assist the member. MCOs must develop methods for prompt follow-up and remediation of identified problems; policies and procedures regarding required timeframes for follow-up and remediation must be submitted to HHS for review and approval. Finally, any changes to a member's risk are identified through an update to the member's risk agreement. MCOs must report on monitoring results to the State.

In the event of non-compliance with service plan timelines, the MCO must: (i) immediately remediate all individual findings identified through its monitoring process; (ii) track and trend such findings and remediation to identify systemic issues of marginal performance and/or non-compliance; (iii) implement strategies to improve community-based case management processes and resolve areas of non-compliance or member dissatisfaction; and (iv) measure the success of such strategies in addressing identified issues.

If the MCO fails to develop a plan of care for HCBS waiver enrollees within the timeframe mutually agreed upon between the MCO and the Agency in the course of Contract negotiations the MCO will be assessed a noncompliance fee of \$315 per occurrence.

**b. Monitoring Safeguard.** Providers of HCBS for the individual, or those who have interest in or are employed by a provider of HCBS; are not permitted to have responsibility for monitoring the implementation of the service plan except, at the option of the state, when providers are given this responsibility because such individuals are the only willing and qualified entity in a geographic area, and the state devises conflict of interest protections. *Select one:*

- ☒ **Entities and/or individuals that have responsibility to monitor service plan implementation, participant health and welfare, and adherence to the HCBS settings requirements may not provide other direct waiver services to the participant.**
- ☐ **Entities and/or individuals that have responsibility to monitor service plan implementation, participant health and welfare, and adherence to the HCBS settings requirements may provide other direct waiver services to the participant because they are the only the only willing and qualified entity in a geographic area who can monitor service plan implementation.** *(Explain how the HCBS waiver service provider is the only willing and qualified entity in a geographic area who can monitor service plan implementation).*

*(Complete only if the second option is selected)* The state has established the following safeguards to mitigate the potential for conflict of interest in monitoring of service plan implementation, participant health and welfare, and adherence to the HCBS settings requirements. *By checking each box, the state attests to having a process in place to ensure:*

- ☐ **Full disclosure to participants and assurance that participants are supported in exercising their right to free choice of providers and are provided information about the full range of waiver services, not just the services furnished by the entity that is responsible for the person-centered service plan development;**
- ☐ **An opportunity for the participant to dispute the state's assertion that there is not another entity or individual that is not that individual's provider to develop the person-centered service plan through a clear and accessible alternative dispute resolution process;**
- ☐ **Direct oversight of the process or periodic evaluation by a state agency;**

- ☐ Restriction of the entity that develops the person-centered service plan from providing services without the direct approval of the state; and
- ☐ Requirement for the agency that develops the person-centered service plan to administratively separate the plan development function from the direct service provider functions.

## Appendix D: Participant-Centered Planning and Service Delivery

### Quality Improvement: Service Plan

*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: Service Plan Assurance/Sub-assurances

*The state demonstrates it has designed and implemented an effective system for reviewing the adequacy of service plans for waiver participants.*

##### i. Sub-Assurances:

- a. *Sub-assurance: Service plans address all participants' assessed needs (including health and safety risk factors) and personal goals, either by the provision of waiver services or through other means.*

##### 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:

**SP-a1: Number and percent of service plans that accurately address all the member's assessed needs, including at a minimum, health and safety risk factors, and personal goals. Numerator: # of service plans that accurately address all the member's assessed needs, including at a minimum, health and safety risk factors, and personal goals Denominator: # of reviewed service plans.**

**Data Source** (Select one):

**Record reviews, off-site**

If 'Other' is selected, specify:

**person-centered plans and the results of the department approved assessment**

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):
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input type="checkbox"/> 100% Review
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly	<input checked="" type="checkbox"/> Less than 100% Review
<input type="checkbox"/> Sub-State Entity	<input type="checkbox"/> Quarterly	<input checked="" type="checkbox"/> Representative

		<b>Sample</b> Confidence Interval =  <div>95% confidence level with +/- 5% margin of error</div>
<input checked="" type="checkbox"/> <b>Other</b> Specify:  <div>Contracted entity including MCO</div>	<input type="checkbox"/> <b>Annually</b>	<input checked="" type="checkbox"/> <b>Stratified</b> Describe Group:  <div>           IA.0299 - BI (6%)            IA.0213- AIDS/HIV (.05%)            IA.0242 - ID (47%)            IA.0345 - PD (4%)            IA.0819 - CMH (4%)            IA.4111 - HD (9%)            IA.4155 - Elderly (30%)         </div>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>	<input type="checkbox"/> <b>Other</b> Specify:  <div></div>
	<input type="checkbox"/> <b>Other</b> Specify:  <div></div>	

**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>
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>

Responsible Party for data aggregation and analysis (check each that applies):	Frequency of data aggregation and analysis (check each that applies):
<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>

- b. Sub-assurance: Service plans are updated/revised at least annually, when the individual's circumstances or needs change significantly, or at the request of the individual.**

#### 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.*

- c. Sub-assurance: Services are delivered in accordance with the service plan, including the type, scope, amount, duration, and frequency specified in the service plan.**

#### 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:

**SP-c2: Number and percent of service plans which are updated on or before the member's annual due date. Numerator: # of service plans which were updated on or before the member's annual due date; Denominator: # service plans due for annual update that were reviewed.**

**Data Source (Select one):**

**Record reviews, off-site**

If 'Other' is selected, specify:

**person-centered plans and the results of the department approved assessment.**

<b>Responsible Party for data collection/generation</b> (check each that applies):	<b>Frequency of data collection/generation</b> (check each that applies):	<b>Sampling Approach</b> (check each that applies):
<input type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>	<input type="checkbox"/> <b>100% Review</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>	<input checked="" type="checkbox"/> <b>Less than 100% Review</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>	<input checked="" type="checkbox"/> <b>Representative Sample</b> Confidence Interval =  <div style="border: 1px solid black; padding: 5px; width: fit-content;">             95% confidence level with +/- 5% margin of error           </div>
<input checked="" type="checkbox"/> <b>Other</b> Specify:  <div style="border: 1px solid black; padding: 5px; width: fit-content;">             Contracted entity including MCO           </div>	<input type="checkbox"/> <b>Annually</b>	<input checked="" type="checkbox"/> <b>Stratified</b> Describe Group:  <div style="border: 1px solid black; padding: 5px; width: fit-content;">             IA.0299 - BI (6%)              IA.0213- AIDS/HIV (.05%)              IA.0242 - ID (47%)              IA.0345 - PD (4%)              IA.0819 - CMH (4%)              IA.4111 - HD (9%)              IA.4155 - Elderly (30%)           </div>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>	<input type="checkbox"/> <b>Other</b> Specify:  <div style="border: 1px solid black; height: 30px; width: 100%;"></div>
	<input type="checkbox"/> <b>Other</b> Specify:	



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**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>
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>

**Performance Measure:**

**SP-c1: Number and percent of CAHPS respondents who responded “YES” on the CAHPS survey to question 53 “In the last 3 months, did this {case manager} work with you when you asked for help with getting other changes to your services?”. Please see Main: Optional for the full description, including the Numerator and Denominator**

**Data Source** (Select one):**Record reviews, off-site**

If 'Other' is selected, specify:

**FFS CAHPS and MCO CAHPS databases**

<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>
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input type="checkbox"/> 100% Review
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly	<input checked="" type="checkbox"/> Less than 100% Review

<input type="checkbox"/> Sub-State Entity	<input type="checkbox"/> Quarterly	<input checked="" type="checkbox"/> <b>Representative Sample</b> Confidence Interval = <div>95% confidence level with +/- 5% margin of error</div>
<input checked="" type="checkbox"/> <b>Other</b> Specify: <div>Contracted entity including MCO</div>	<input type="checkbox"/> Annually	<input checked="" type="checkbox"/> <b>Stratified</b> Describe Group: <div>           IA.0299 - BI (6%)            IA.0213- AIDS/HIV (.05%)            IA.0242 - ID (47%)            IA.0345 - PD (4%)            IA.0819 - CMH (4%)            IA.4111 - HD (9%)            IA.4155 - Elderly (30%)         </div>
	<input type="checkbox"/> Continuously and Ongoing	<input type="checkbox"/> <b>Other</b> Specify: <div></div>
	<input type="checkbox"/> <b>Other</b> Specify: <div></div>	

**Data Aggregation and Analysis:**

<b>Responsible Party for data aggregation and analysis</b> (check each that applies):	<b>Frequency of data aggregation and analysis</b> (check each that applies):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly

<b>Responsible Party for data aggregation and analysis</b> (check each that applies):	<b>Frequency of data aggregation and analysis</b> (check each that applies):
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>

**d. Sub-assurance: Participants are afforded choice between/among waiver services and providers.**

**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:**

**SP-d1: Number and percent of members whose services were delivered according to the service plan, including type, scope, amount, duration, and frequency specified in the plan. Numerator: # of members whose services were delivered according to the service plan, including type, scope, amount, duration, and frequency specified in the plan. Denominator: # of member's service plans reviewed**

**Data Source** (Select one):

**Record reviews, off-site**

If 'Other' is selected, specify:

**Service plans are requested from the case managers, with service provision documentation requested from providers.**

<b>Responsible Party for data collection/generation</b> (check each that applies):	<b>Frequency of data collection/generation</b> (check each that applies):	<b>Sampling Approach</b> (check each that applies):
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input type="checkbox"/> 100% Review

<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly	<input checked="" type="checkbox"/> Less than 100% Review
<input type="checkbox"/> Sub-State Entity	<input type="checkbox"/> Quarterly	<input checked="" type="checkbox"/> Representative Sample Confidence Interval = <div>95% confidence level with +/- 5% margin of error</div>
<input checked="" type="checkbox"/> Other Specify: <div>Contracted entity including MCO</div>	<input type="checkbox"/> Annually	<input checked="" type="checkbox"/> Stratified Describe Group: <div>           IA.0299 - BI (6%)            IA.0213- AIDS/HIV (.05%)            IA.0242 - ID (47%)            IA.0345 - PD (4%)            IA.0819 - CMH (4%)            IA.4111 - HD (9%)            IA.4155 - Elderly (30%)         </div>
	<input type="checkbox"/> Continuously and Ongoing	<input type="checkbox"/> Other Specify: <div></div>
	<input type="checkbox"/> Other Specify: <div></div>	

**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> ):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> 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>
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>

**e. Sub-assurance:** *The state monitors service plan development in accordance with its policies and procedures.*

#### 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:

**SP-e1: Number and percent of CAHPS respondents who responded with either "MOST" or "ALL" on the CAHPS survey to question 56 "In the last 3 months, did your service plan include . . . of the things that are important to you". Please see Main B Optional for full description**

**Data Source** (Select one):

**Analyzed collected data (including surveys, focus group, interviews, etc)**

If 'Other' is selected, specify:

**FFS CAHPS data and MCO CAHPS databases**

<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>
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input type="checkbox"/> 100% Review

<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly	<input checked="" type="checkbox"/> Less than 100% Review
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly	<input checked="" type="checkbox"/> Representative Sample Confidence Interval = <div>95% confidence level with +/- 5% margin of error</div>
<input checked="" type="checkbox"/> Other Specify: <div>Contracted entity including MCO</div>	<input type="checkbox"/> Annually	<input checked="" type="checkbox"/> Stratified Describe Group: <div>           IA.0299 - BI (6%)            IA.0213- AIDS/HIV (.05%)            IA.0242 - ID (47%)            IA.0345 - PD (4%)            IA.0819 - CMH (4%)            IA.4111 - HD (9%)            IA.4155 - Elderly (30%)         </div>
	<input type="checkbox"/> Continuously and Ongoing	<input type="checkbox"/> Other Specify: <div></div>
	<input type="checkbox"/> Other Specify: <div></div>	

**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>
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> 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>
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>

**Performance Measure:**

**SP-e2: Number and percent of service plans from the HCBS QA survey review that indicated the member had a choice of HCBS service providers. Numerator: Number of service plans from the HCBS QA survey review that indicated the member had a choice of HCBS service providers; Denominator: Number of service plans from the HCBS QA survey that were reviewed.**

**Data Source** (Select one):**Record reviews, off-site**

If 'Other' is selected, specify:

**FFS QA review of service plan stored in OnBase. MCO review services plans available through their system.**

<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>
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input type="checkbox"/> 100% Review
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly	<input checked="" type="checkbox"/> Less than 100% Review
<input type="checkbox"/> Sub-State Entity	<input type="checkbox"/> Quarterly	<input checked="" type="checkbox"/> Representative Sample Confidence Interval =

		95% confidence level with +/- 5% margin of error
<input checked="" type="checkbox"/> <b>Other</b> Specify:  <div>Contracted entity including MCO</div>	<input type="checkbox"/> <b>Annually</b>	<input checked="" type="checkbox"/> <b>Stratified</b> Describe Group:  <div>           IA.0299 - BI (6%)            IA.0213- AIDS/HIV (.05%)            IA.0242 - ID (47%)            IA.0345 - PD (4%)            IA.0819 - CMH (4%)            IA.4111 - HD (9%)            IA.4155 - Elderly (30%)         </div>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>	<input type="checkbox"/> <b>Other</b> Specify:  <div></div>
	<input type="checkbox"/> <b>Other</b> Specify:  <div></div>	

**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>
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>
<input type="checkbox"/> <b>Other</b> Specify:	<input type="checkbox"/> <b>Annually</b>



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

**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.

The Medical Services Unit utilizes criteria to grade each reviewed service plan component. If it is determined that the service plan does not meet the standards for component(s), the case manager is notified of deficiency and expectations for remediation. MCOs are responsible for oversight of service plans for their members.

The HCBS QIO has identified CAHPS questions and answers that demand additional attention. These questions are considered urgent in nature and are flagged for follow-up. Based on the responses to these flagged questions, the HCBS interviewer performs education to the member at the time of the interview and requests additional information and remediation from the case manager.

General methods for problem correction at a systemic level include informational letters, provider training, collaboration with stakeholders and changes in policy.

**ii. Remediation Data Aggregation**

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

Responsible Party (check each that applies):	Frequency of data aggregation and analysis (check each that applies):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input type="checkbox"/> Quarterly
<input checked="" type="checkbox"/> Other Specify: <input type="text"/> Contracted entity including MCOs	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other

Responsible Party <i>(check each that applies):</i>	Frequency of data aggregation and analysis <i>(check each that applies):</i>
	Specify: <div></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 Service Plans that are currently non-operational.

- ☒ No
- ☐ Yes

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

Appendix E: Participant Direction of Services

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**Applicability** *(from Application Section 3, Components of the Waiver Request):*

- ☒ **Yes. This waiver provides participant direction opportunities.** Complete the remainder of the Appendix.
- ☐ **No. This waiver does not provide participant direction opportunities.** Do not complete the remainder of the Appendix.

*CMS urges states to afford all waiver participants the opportunity to direct their services. Participant direction of services includes the participant exercising decision-making authority over workers who provide services, a participant-managed budget or both.*

Appendix E: Participant Direction of Services

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E-1: Overview (1 of 13)

**a. Description of Participant Direction.** In no more than two pages, provide an overview of the opportunities for participant direction in the waiver, including: (a) the nature of the opportunities afforded to participants; (b) how participants may take advantage of these opportunities; (c) the entities that support individuals who direct their services and the supports that they provide; and, (d) other relevant information about the waiver's approach to participant direction.

Iowa offers the Consumer Choices Option (CCO) for participant direction. There is no difference in how the CCO works with the MCO and FFS members. The MCO per member/per month capitation does not affect the self-direction process; and the capitation does not affect the amount of budget available to the member.

#### Consumer Choices Option (CCO)

The CCO offers both employer and budget authority to the member self-directing services. At the time-of-service plan development and/or at the member's request, the member has the option to convert the following services into an individualized self-direction budget based on services that are authorized in their service plan: (1) attendant care (unskilled), (2) adult day care, (3) Home Maintenance Support, (4) Home Delivered Meals, (5) Respite.

CCO gives members control over a targeted amount of waiver dollars. Under CCO a member may convert specific waiver services that have been authorized in the member's service plan to create an individual monthly budget. Members that choose to use CCO will use the individual monthly budget to meet their assessed needs by directly hiring employees or purchase other goods and services. A member may use the following three types of self-direction services to meet their assessed needs: (1) self-directed personal care services; (2) self-directed community supports and employment; and (3) individual-directed goods and services.

If any of these options are elected, Financial Management Service (FMS), by Sate administrative rule, must be involved. Th member may elect to receive assistance with budget development through an Independent Support Broker (ISB) or their Case Manager. Two budgets will be developed as a result of the service plan development traditional services budget (includes traditional services for which the member does not have budget or employer authority) and the individual budget (includes services and supports for which the member does have budget and employer authority).

Self-directed personal care services are services and/or goods that provide a range of assistance in the member's home or community, as well as activities of daily living and incidental activities of daily living that help the person remain in their home and in their community. Self-directed Community Supports and Employment are services that support the member in developing and maintaining life and community integration. Individual-directed goods and services are services, equipment or supplies not otherwise provided through the Medicaid State Plan that address an identified need in the service plan. The item or services would decrease the need for other Medicaid services, and/or promote inclusion in the community, and/or increase the member's safety in the community or home.

Members have authority over the individual authorized budget to perform the following tasks: (1) contract with entities to provide services and support; (2) determine the amount to be paid for services with the exception of the independent support broker and the financial management service whereas reimbursement rates are subject to the limits in 441 Iowa Administrative Code Chapter 79.1(2); (3) schedule the provision for services; (4) authorize payment for waiver goods and services identified in the individual budget; and (5) reallocate funds among services included in the budget. Individual monthly budget development includes the costs of the FMS, ISB if applicable, and any services and supports chosen by the member as optional service components.

All members choosing CCO may choose to work with an ISB who will help them plan with their individual budget and services. The ISB works at the direction of the member and assists the member with their budget. For example, the ISB may help develop a monthly budget, recruit and interview potential employees, or assist with required paperwork. The ISB is required to attend an ISB training prior working with members. The ISB cannot be the guardian, power of attorney, or a provider of service to the member to avoid potential conflicts of interest. Per 441 Iowa Administrative Code 78.34(13)"k," the ISB "shall perform the following services as directed by the member or the member's representative: (1) Assist the member with developing the member's initial and subsequent individual budgets and with making any changes to the individual budget. (2) Have monthly contact with the member for the first four months of implementation of the initial individual budget and have quarterly contact thereafter. (3) Complete the required employment packet with the financial management service. (4) Assist with interviewing potential employees and entities providing services and supports if requested by the member. (5) Assist the member with determining whether a potential employee meets the qualifications necessary to perform the job. (6) Assist the member with obtaining a signed consent from a potential employee to conduct background checks if requested by the member. (7) Assist the member with negotiating with entities providing services and supports if requested by the member.

- (8) Assist the member with contracts and payment methods for services and supports if requested by the member.
- (9) Assist the member with developing an emergency backup plan. The emergency backup plan shall address any health and safety concerns.
- (10) Review expenditure reports from the financial management service to ensure that services and supports in the individual budget are being provided.
- (11) Document in writing on the independent support broker timecard every contact the broker has with the member. Contact documentation shall include information on the extent to which the member's individual budget has addressed the member's needs and the satisfaction of the member."

Members will also work with an FMS provider that will receive Medicaid funds on behalf of the member. The FMS is a Medicaid provider and receives an electronic funds transfer (EFT) on a monthly basis for the member's monthly budget amount. The FMS is responsible for paying all employer taxes as required. Employees of the member are required to submit timecards within thirty days of providing the service for payment. The member's monthly budget includes a monthly per member, per month fee for the FMS provider, with the remainder designated for the purchase of goods and services for the member. Per 441 Iowa Administrative Code 78.34(13)"1," the FMS "shall perform all of the following services:

- (1) Receive Medicaid funds in an electronic transfer.
- (2) Process and pay invoices for approved goods and services included in the individual budget.
- (3) Enter the individual budget into the Web-based tracking system chosen by the department and enter expenditures as they are paid.
- (4) 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).
- (5) Conduct criminal background checks on potential employees pursuant to 441—Chapter 119.
- (6) Verify for the member an employee's citizenship or alien status.
- (7) Assist the member with fiscal and payroll-related responsibilities including, but not limited to:
  - 1. Verifying that hourly wages comply with federal and state labor rules.
  - 2. Collecting and processing timecards.
  - 3. 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.
  - 4. Computing and processing other withholdings, as applicable.
  - 5. Processing all judgments, garnishments, tax levies, or other withholding on an employee's pay as may be required by federal, state, or local laws.
  - 6. Preparing and issuing employee payroll checks.
  - 7. Preparing and disbursing IRS Forms W-2 and W-3 annually.
  - 8. Processing federal advance earned income tax credit for eligible employees.
  - 9. Refunding over-collected FICA, when appropriate.
  - 10. Refunding over-collected FUTA, when appropriate.
- (8) Assist the member in completing required federal, state, and local tax and insurance forms.
- (9) Establish and manage documents and files for the member and the member's employees.
- (10) 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.
- (11) 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.
- (12) Establish an accessible customer service system and a method of communication for the member and the independent support broker that includes alternative communication formats.
- (13) Establish a customer services complaint reporting system.
- (14) Develop a policy and procedures manual that is current with state and federal regulations and update as necessary.
- (15) Develop a business continuity plan in the case of emergencies and natural disasters.
- (16) Provide to the department an annual independent audit of the financial management service.
- (17) Assist in implementing the state's quality management strategy related to the financial management service."

A utilization adjustment factor (UAF) 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 members 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.

## Appendix E: Participant Direction of Services

### E-1: Overview (2 of 13)

**b. Participant Direction Opportunities.** Specify the participant direction opportunities that are available in the waiver.

*Select one:*

- ☐ **Participant: Employer Authority.** As specified in *Appendix E-2, Item a*, the participant (or the participant's representative) has decision-making authority over workers who provide waiver services. The participant may function as the common law employer or the co-employer of workers. Supports and protections are available for participants who exercise this authority.
- ☐ **Participant: Budget Authority.** As specified in *Appendix E-2, Item b*, the participant (or the participant's representative) has decision-making authority over a budget for waiver services. Supports and protections are available for participants who have authority over a budget.
- ☒ **Both Authorities.** The waiver provides for both participant direction opportunities as specified in *Appendix E-2*. Supports and protections are available for participants who exercise these authorities.

**c. Availability of Participant Direction by Type of Living Arrangement.** *Check each that applies:*

- ☒ Participant direction opportunities are available to participants who live in their own private residence or the home of a family member.
- ☒ Participant direction opportunities are available to individuals who reside in other living arrangements where services (regardless of funding source) are furnished to fewer than four persons unrelated to the proprietor.
- ☒ The participant direction opportunities are available to persons in the following other living arrangements

Specify these living arrangements:

Assisted Living Facilities certified by the Department of Inspections and Appeals. The Department does not allow the use of self-direction services to members living in residential care facilities.

## Appendix E: Participant Direction of Services

### E-1: Overview (3 of 13)

**d. Election of Participant Direction.** Election of participant direction is subject to the following policy (*select one*):

- ☐ Waiver is designed to support only individuals who want to direct their services.
- ☒ The waiver is designed to afford every participant (or the participant's representative) the opportunity to elect to direct waiver services. Alternate service delivery methods are available for participants who decide not to direct their services.
- ☐ The waiver is designed to offer participants (or their representatives) the opportunity to direct some or all of their services, subject to the following criteria specified by the state. Alternate service delivery methods are available for participants who decide not to direct their services or do not meet the criteria.

*Specify the criteria*

## Appendix E: Participant Direction of Services

### E-1: Overview (4 of 13)

- e. Information Furnished to Participant.** Specify: (a) the information about participant direction opportunities (e.g., the benefits of participant direction, participant responsibilities, and potential liabilities) that is provided to the participant (or the participant's representative) to inform decision-making concerning the election of participant direction; (b) the entity or entities responsible for furnishing this information; and, (c) how and when this information is provided on a timely basis.

Self-direction training and outreach materials are available through the Iowa Medicaid website and MCOs. Materials include information on the benefits, responsibilities, and liabilities of self-direction. A brochure about this option has been developed and includes information about the benefits, responsibilities, and liabilities. This brochure is available at all the local HHS offices, the HHS website, and has been distributed to other community agencies. The member may also call Iowa Medicaid Member Services and request to have the brochure mailed directly to them.

The case manager, or community-based case manager is required to discuss this option along with the benefits, responsibilities, and liabilities at the time of the service plan development and/or any time the member's needs change. This results in information about member direction activities being reviewed, at least annually, with the member. This option is intended to be very flexible; members can choose this option at any time. Once given information about this option, the member can immediately elect this option or can elect to continue or start with traditional services initially and then change to self-direction at a later date. All members must sign an informed consent contract and a risk agreement that permits the member to acknowledge and accept certain responsibilities for addressing risks.

MCOs and Iowa Medicaid provide ongoing member or representative training upon request and/or if it is determined a member needs additional training. Training programs are designed to address the following: (i) understanding the role of members and/or representatives in self-direction; (ii) selecting and terminating providers; (iii) being an employer and managing employees; (iv) conducting administrative tasks such as staff evaluations and approval of time sheets; (v) scheduling providers; and (vi) back-up planning. All MCO training and education materials are subject to review and approval by the State.

To give the member an opportunity to locate providers and supports, the service plan can reflect that traditional services will begin at the start date of the service plan and the self-directed services and supports will begin at a later date. This does not require a change in the service plan. Members can elect self-direction and then elect to go back to traditional services at any time. The case manager or community-based case manager is responsible for informing the member of their rights and responsibilities. All self-directed services and supports must begin on the first of a month.

## Appendix E: Participant Direction of Services

### E-1: Overview (5 of 13)

- f. Participant Direction by a Representative.** Specify the state's policy concerning the direction of waiver services by a representative (*select one*):

- ☐ The state does not provide for the direction of waiver services by a representative.
- ☒ The state provides for the direction of waiver services by representatives.

Specify the representatives who may direct waiver services: (*check each that applies*):

- ☒ Waiver services may be directed by a legal representative of the participant.
- ☒ Waiver services may be directed by a non-legal representative freely chosen by an adult participant.
- Specify the policies that apply regarding the direction of waiver services by participant-appointed representatives, including safeguards to ensure that the representative functions in the best interest of the

participant:

Services may be self-directed by a non-legal representative freely chosen by an adult member. The policies described in this section apply to both the fee-for-service and managed care delivery systems. If the member selects a non-legal representative, the representative cannot be a paid provider of services and must be eighteen years or age or older. The member and the representative must sign a consent form designating who they have chosen as their representative and what responsibilities the representative will have. The choice must be documented in the member’s file and provided to the member and their representative. At a minimum, the representative’s responsibilities include ensuring decisions made do not jeopardize the health and welfare of the member and ensuring decisions made do not financially exploit the member.

Iowa Medicaid uses a quality assurance process to interview members in order to determine whether or not the representative has been working in their best interest. The interviews are completed primarily by telephone and may be completed in-person if requested. The interviews are conducted as an ongoing QA activity and are used to ensure that members’ needs are met and that services are provided. QA interviews are completed monthly with a randomly selected representative sample of members. The interview sample selection size assures a 95% confidence level in the results of the interviews.

In addition, the Independent Support Broker provides monitoring of health and safety. The member’s case manager or CBCM is responsible to assess individual needs and monitor service delivery to assure that the member’s health and safety are being addressed. Case managers and routinely review how services are being provided and monitor services to assure the member’s needs are being met, including how the representative is performing.

MCOs are contractually required to maintain quality assurance processes to ensure that the representative functions in the best interest of the member. These quality assurance processes are subject to HHS review and approval and include, but are not limited to, monthly member interviews, to assess whether a non-legal representative is working in the best interest of the member. HHS provides additional oversight in accordance with the HCBS quality improvement strategy.

Appendix E: Participant Direction of Services

E-1: Overview (6 of 13)

**g. Participant-Directed Services.** Specify the participant direction opportunity (or opportunities) available for each waiver service that is specified as participant-directed in Appendix C-1/C-3.

Waiver Service	Employer Authority	Budget Authority
Skilled Attendant Care	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Adult Day Care	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Home Maintenance Support	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Home Delivered Meals	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Individual Directed Goods and Services	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Attendant Care	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Self Directed Community Support and Employment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Respite	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Independent Support Broker	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Appendix E: Participant Direction of Services

E-1: Overview (7 of 13)

**h. Financial Management Services.** Except in certain circumstances, financial management services are mandatory and integral to participant direction. A governmental entity and/or another third-party entity must perform necessary financial transactions on behalf of the waiver participant. *Select one:*

- ☒ **Yes. Financial Management Services are furnished through a third party entity.** *(Complete item E-1-i).*

Specify whether governmental and/or private entities furnish these services. *Check each that applies:*

☐ **Governmental entities**

☒ **Private entities**

- ☐ **No. Financial Management Services are not furnished. Standard Medicaid payment mechanisms are used.** *Do not complete Item E-1-i.*

## Appendix E: Participant Direction of Services

### E-1: Overview (8 of 13)

**i. Provision of Financial Management Services.** Financial management services (FMS) may be furnished as a waiver service or as an administrative activity. *Select one:*

- ☒ **FMS are covered as the waiver service specified in Appendix C-1/C-3**

**The waiver service entitled:**

Financial Management Services

- ☐ **FMS are provided as an administrative activity.**

**Provide the following information**

**i. Types of Entities:** Specify the types of entities that furnish FMS and the method of procuring these services:

The financial institution shall either: (1) Be cooperative, nonprofit, member-owned and member-controlled, and federally insured through and chartered by either the National Credit Union Administration (NCUA) or the credit union division of the Iowa department of commerce; or (2) Be chartered by the Office of the Comptroller of the Currency, a bureau of the U.S. Department of the Treasury, and insured by the Federal Deposit Insurance Corporation (FDIC).

The financial institution shall complete a financial management readiness review and certification conducted by the department or its designee.

The financial institution shall obtain an Internal Revenue Service federal employee identification number dedicated to the financial management service.

The financial institution shall enroll as a Medicaid provider. MCOs are responsible for contracting with an FMS entity or entities to assist members who elect to self-direct.

All MCO contracted FMS entities must meet the requirements documented in this section. Under the managed care delivery system, the FMS entity contracted with the MCO is responsible for the same functions as under the fee-for-service model.

**ii. Payment for FMS.** Specify how FMS entities are compensated for the administrative activities that they perform:

FMS entities are paid a monthly fee for their services.

**iii. Scope of FMS.** Specify the scope of the supports that FMS entities provide *(check each that applies):*

Supports furnished when the participant is the employer of direct support workers:



- ☒ Assist participant in verifying support worker citizenship status
- ☒ Collect and process timesheets of support workers
- ☒ Process payroll, withholding, filing and payment of applicable federal, state and local employment-related taxes and insurance
- ☐ Other

*Specify:*

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Supports furnished when the participant exercises budget authority:

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- ☒ Maintain a separate account for each participant's participant-directed budget
- ☒ Track and report participant funds, disbursements and the balance of participant funds
- ☒ Process and pay invoices for goods and services approved in the service plan
- ☒ Provide participant with periodic reports of expenditures and the status of the participant-directed budget
- ☐ Other services and supports

*Specify:*

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Additional functions/activities:

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- ☒ Execute and hold Medicaid provider agreements as authorized under a written agreement with the Medicaid agency
- ☒ Receive and disburse funds for the payment of participant-directed services under an agreement with the Medicaid agency or operating agency
- ☒ Provide other entities specified by the state with periodic reports of expenditures and the status of the participant-directed budget
- ☐ Other

*Specify:*

**iv. Oversight of FMS Entities.** Specify the methods that are employed to: (a) monitor and assess the performance of FMS entities, including ensuring the integrity of the financial transactions that they perform; (b) the entity (or entities) responsible for this monitoring; and, (c) how frequently performance is assessed.

Iowa Medicaid provides oversight of the FMS entities and monitors their performance yearly. Oversight is conducted through an annual self-assessment, and an on-site review completed by HHS or by a designated Iowa Medicaid unit. As noted above, FMS entities must also be enrolled as Medicaid providers. The MCOs are required to mirror this oversight process for their FMS entities and the Iowa Medicaid reviews for compliance and monitors outcomes.

## Appendix E: Participant Direction of Services

### E-1: Overview (9 of 13)

**j. Information and Assistance in Support of Participant Direction.** In addition to financial management services, participant direction is facilitated when information and assistance are available to support participants in managing their services. These supports may be furnished by one or more entities, provided that there is no duplication. Specify the payment authority (or authorities) under which these supports are furnished and, where required, provide the additional information requested (*check each that applies*):

- ☒ **Case Management Activity.** Information and assistance in support of participant direction are furnished as an element of Medicaid case management services.

*Specify in detail the information and assistance that are furnished through case management for each participant direction opportunity under the waiver:*

The case manager or community-based case manager provides the waiver member with information and assistance with choosing the CCO program as part of the person-centered service planning process. The case manager or community-based case manager also assists the member in locating an Individual Support Broker to assist with the planning and managing a monthly CCO budget and is responsible for monitoring the delivery of goods and services as identified in the service plan.

The CCO program conducts regular CCO webinars to provide case managers, community-based case managers, and ISB's with information on understanding and implementing the CCO program. The webinars also identify self-direction issues that have been identified through quality assurance activities. All case managers and community-based case managers are welcome to attend the webinars, which are also recorded and made available for those unable to attend.

- ☒ **Waiver Service Coverage.**

Information and assistance in support of participant direction are provided through the following waiver service coverage(s) specified in Appendix C-1/C-3 (*check each that applies*):

Participant-Directed Waiver Service	Information and Assistance Provided through this Waiver Service Coverage
Skilled Attendant Care	<input type="checkbox"/>
Adult Day Care	<input type="checkbox"/>
Home Health Aide	<input type="checkbox"/>
Home Maintenance Support	<input type="checkbox"/>
Home Delivered Meals	<input type="checkbox"/>
Counseling	<input type="checkbox"/>
Nursing	<input type="checkbox"/>
Individual Directed Goods and Services	<input checked="" type="checkbox"/>
Attendant Care	<input type="checkbox"/>
Self Directed Community Support and Employment	<input checked="" type="checkbox"/>
Respite	<input type="checkbox"/>
Financial Management Services	<input checked="" type="checkbox"/>

Participant-Directed Waiver Service	Information and Assistance Provided through this Waiver Service Coverage
Independent Support Broker	<input checked="" type="checkbox"/>

☒ **Administrative Activity.** Information and assistance in support of participant direction are furnished as an administrative activity.

*Specify (a) the types of entities that furnish these supports; (b) how the supports are procured and compensated; (c) describe in detail the supports that are furnished for each participant direction opportunity under the waiver; (d) the methods and frequency of assessing the performance of the entities that furnish these supports; and, (e) the entity or entities responsible for assessing performance:*

Through a contract with Iowa Medicaid, the QIO HCBS Unit provides support and assistance to service workers, case managers, community-based case managers, members, providers, ISBs, and others needing information about HCBS waiver programs. This includes the self-direction program. The technical assistance provided includes developing and conducting regularly scheduled webinar trainings, developing and implementing required ISB training and answering questions from the field about the CCO program.

The Quality Assurance and Technical Assistance contract is procured through a competitive bidding process. A request for proposal is issued every three years to solicit bids. The RFP specifies the scope of work to be completed by the contractor. The RFP process also includes a pricing component to assure that the contractor is reimbursed in an amount that assures performance outcomes are achieved in a cost-effective manner.

The Quality Assurance and Technical Assistance contract is managed by an Iowa Medicaid state employee. This employee acts as the contract manager and manages the day-to-day operations of the contract to assure compliance with the performance outcomes of the contract. Contract reports are received by the Iowa Medicaid monthly, quarterly and annually on the performance measures of the contract. Any performance issues that arise are addressed with the Quality Assurance and Technical Assistance Unit contract manager to make corrections and improve performance.

Appendix E: Participant Direction of Services

E-1: Overview (10 of 13)

k. Independent Advocacy (select one).

- ☒ No. Arrangements have not been made for independent advocacy.
- ☐ Yes. Independent advocacy is available to participants who direct their services.

*Describe the nature of this independent advocacy and how participants may access this advocacy:*

Appendix E: Participant Direction of Services

E-1: Overview (11 of 13)

**I. Voluntary Termination of Participant Direction.** Describe how the state accommodates a participant who voluntarily terminates participant direction in order to receive services through an alternate service delivery method, including how the state assures continuity of services and participant health and welfare during the transition from participant direction:

Members may receive traditional waiver services, as well as services and supports under an individual budget for self-direction. Any waiver member may voluntarily discontinue the self-direction option at any time, regardless of delivery system (FFS members or MCO members). The member will continue to be eligible for services as specified in the service plan, regardless of whether they select the self-direction option. When CCO is discontinued or the CCO services are voluntarily reduced, a new service plan will be developed to authorize needed services that will be provided through an enrolled AIDS/HIV Waiver provider or CCO. The case manager or community-based case manager will work with the member to ensure that a current service plan is authorized, and services are in place and service continuity is maintained.

Appendix E: Participant Direction of Services

E-1: Overview (12 of 13)

**m. Involuntary Termination of Participant Direction.** Specify the circumstances when the state will involuntarily terminate the use of participant direction and require the participant to receive provider-managed services instead, including how continuity of services and participant health and welfare is assured during the transition.

For fee-for-service enrollees, case managers will terminate use of the self-direction option any time there is substantial evidence of Medicaid fraud or obvious misuse of funds. Involuntary termination can also occur if the case manager is not able to verify the types of services provided and the outcome of those services. If the participant and their representative are both found unable to self-direct, the participant will be transitioned to regular waiver services. The participant has the right to appeal any adverse action taken by the case manager to terminate self-directed services and is subject to the grievance and appeals protections outlined in Appendix F. The case manager will develop a new service plan and assure alternative services are in place to maintain service.

MCOs may only initiate involuntarily termination of a member’s use of the self-direction option if there is evidence of Medicaid fraud or misuse of funds, or if the MCO determines there is a risk to the member’s health or safety. Under these conditions, MCOs are required to submit a request to HHS for review and approval to involuntarily terminate. Requests must contain sufficient documentation regarding the rationale for termination. Upon HHS approval, MCOs must notify the member and facilitate a seamless transition to traditional waiver services to ensure there are no interruptions or gaps in service delivery.

Appendix E: Participant Direction of Services

E-1: Overview (13 of 13)

**n. Goals for Participant Direction.** In the following table, provide the state's goals for each year that the waiver is in effect for the unduplicated number of waiver participants who are expected to elect each applicable participant direction opportunity. Annually, the state will report to CMS the number of participants who elect to direct their waiver services.

Table E-1-n

	Employer Authority Only	Budget Authority Only or Budget Authority in Combination with Employer Authority
Waiver Year	Number of Participants	Number of Participants
Year 1		5
Year 2		5
Year 3		5
Year 4		5
Year 5		5

Appendix E: Participant Direction of Services

E-2: Opportunities for Participant Direction (1 of 6)

**a. Participant - Employer Authority** Complete when the waiver offers the employer authority opportunity as indicated in

Item E-1-b:

**i. Participant Employer Status.** Specify the participant's employer status under the waiver. *Select one or both:*

- ☐ **Participant/Co-Employer.** The participant (or the participant's representative) functions as the co-employer (managing employer) of workers who provide waiver services. An agency is the common law employer of participant-selected/recruited staff and performs necessary payroll and human resources functions. Supports are available to assist the participant in conducting employer-related functions.

Specify the types of agencies (a.k.a., agencies with choice) that serve as co-employers of participant-selected staff:

- ☒ **Participant/Common Law Employer.** The participant (or the participant's representative) is the common law employer of workers who provide waiver services. An IRS-approved Fiscal/Employer Agent functions as the participant's agent in performing payroll and other employer responsibilities that are required by federal and state law. Supports are available to assist the participant in conducting employer-related functions.

**ii. Participant Decision Making Authority.** The participant (or the participant's representative) has decision making authority over workers who provide waiver services. *Select one or more decision making authorities that participants exercise:*

- ☒ **Recruit staff**
- ☐ **Refer staff to agency for hiring (co-employer)**
- ☐ **Select staff from worker registry**
- ☒ **Hire staff common law employer**
- ☒ **Verify staff qualifications**
- ☒ **Obtain criminal history and/or background investigation of staff**

Specify how the costs of such investigations are compensated:

Pursuant to Iowa Code 249A.29 and Iowa Code 135C. 33(5)(a)(1) and (5)(a)(3), all providers of HCBS waiver services must complete child abuse, dependent adult abuse and criminal background screenings before employment of a prospective staff member who will provide care for a participant. The State pays for the first background check of workers who provide waiver services to fee-for-service participants. If a second background check is completed, it is the responsibility of the employee to pay for the background check. MCOs are responsible for the costs of investigations of workers who provide waiver services to members.

- ☒ **Specify additional staff qualifications based on participant needs and preferences so long as such qualifications are consistent with the qualifications specified in Appendix C-1/C-3.**

Specify the state's method to conduct background checks if it varies from Appendix C-2-a:

Same as C-2-a above.

- ☒ **Determine staff duties consistent with the service specifications in Appendix C-1/C-3.**
- ☒ **Determine staff wages and benefits subject to state limits**
- ☒ **Schedule staff**
- ☒ **Orient and instruct staff in duties**
- ☒ **Supervise staff**

- ☒ Evaluate staff performance
- ☒ Verify time worked by staff and approve time sheets
- ☒ Discharge staff (common law employer)
- ☐ Discharge staff from providing services (co-employer)
- ☐ Other

Specify:

## Appendix E: Participant Direction of Services

### E-2: Opportunities for Participant-Direction (2 of 6)

**b. Participant - Budget Authority** *Complete when the waiver offers the budget authority opportunity as indicated in Item E-1-b:*

**i. Participant Decision Making Authority.** When the participant has budget authority, indicate the decision-making authority that the participant may exercise over the budget. *Select one or more:*

- ☒ Reallocate funds among services included in the budget
- ☒ Determine the amount paid for services within the state's established limits
- ☒ Substitute service providers
- ☒ Schedule the provision of services
- ☒ Specify additional service provider qualifications consistent with the qualifications specified in Appendix C-1/C-3
- ☒ Specify how services are provided, consistent with the service specifications contained in Appendix C-1/C-3
- ☒ Identify service providers and refer for provider enrollment
- ☒ Authorize payment for waiver goods and services
- ☒ Review and approve provider invoices for services rendered
- ☐ Other

Specify:

## Appendix E: Participant Direction of Services

### E-2: Opportunities for Participant-Direction (3 of 6)

**b. Participant - Budget Authority**

**ii. Participant-Directed Budget** Describe in detail the method(s) that are used to establish the amount of the participant-directed budget for waiver goods and services over which the participant has authority, including how the method makes use of reliable cost estimating information and is applied consistently to each participant. Information about these method(s) must be made publicly available.

Under the traditional service model for the waiver, the member chooses a service provider from a list of providers who are enrolled with Iowa Medicaid. The case manager and member work together to detail the tasks and goals for the provider. After service provision, the provider submits a claim to Iowa Medicaid where the claim is adjudicated in accordance with Iowa Medicaid protocols.

Under the self-direction option, a member is not limited to the providers who have enrolled with Iowa Medicaid. The member is considered the employer and can choose any individual that they feel is qualified to provide the needed service. Members create support plans, make provider and service choices, select and employ staff, and monitor the quality of support services. MCOs are responsible for assisting the member with quality assurance activities and monitoring the quality of services provided. MCO plans to accomplish this contractual requirement are subject to HHS review and approval. Members determine the wages to be paid to the provider and the units of service (limited by the self-direction budget). Interviewing, hiring, scheduling, and firing is done by the member. Claims are submitted to the FMS for processing for payment.

Each member who chooses to self-direct their services will continue to have a traditional service plan developed that is based on the level of care assessment and need of the member. If a member has a need for the services that can be included in the individual budget and they choose to self-direct one or all of those services, then the individual budget amount is determined by the amount of service that was authorized for those services under the traditional service plan. The level of need is determined by the level of care determination made by Iowa Medicaid MSU; the supports needed and the amount of supports needed are determined by a review of the assessment made by the case manager prior to the member selecting the self-direction option. Members who reside in an assisted living facility may also choose to self-direct some of their services. Specifically, the member can choose to self-direct services not provided by the facility or can choose another provider for services that are optional from the facility.

Historically, members do not use 100% of their authorized waiver services. To ensure that the State or MCO does not spend more than what is historically spent for traditional waiver services, each service authorized under self-direction will have a utilization adjustment factor applied to it. This utilization adjustment factor is determined by an analysis of what percentage of authorized services has historically been used for each service on an aggregate by all members enrolled in that particular waiver who have accessed that particular service. The utilization factor is not based upon individual member usage, but on historical percentage usage of authorized services by all members enrolled in the waiver who have accessed that particular service. A member new to the waiver or new to self-direction would have the same utilization factor applied as all other waiver members who are self-directing services. The utilization adjustment factor will be analyzed, at a minimum, every 12 months and adjusted as needed based historical use. This method will be used for all waiver members choosing the self-direction option. Members are notified of the budget methodology and limits at the time they receive the CCO Booklet, during their service plan is development and by the Independent Support Broker hired to assist the individual to develop the budget. The individual budget methodology is stated in the 441 Iowa Administrative Code Chapter 78.41(15). In addition, this information is shared during all outreach and training held throughout the State for members, families, and other advocates. The MCOs are also responsible for making the budget methodology available to members through their case managers and member communication materials.

The following is an example of how an individual budget is determined:

A member has a need for a particular service. On their traditional service plan they are authorized 10 units of service at \$20 a unit. That member decides that they would like to self-direct their services. The amount authorized is \$200 in the traditional service plan. A utilization adjustment factor of 80% is applied. The member's individual budget amount then becomes \$160 ( $\$200 \times 80\%$ ). The 20% reduction (100% authorization minus 80% actual utilization for a service) is applied to allow for cost neutrality between the service under the traditional waiver plan and self-direction. If the average service utilization is only 80% of an authorized service under the traditional waiver, then a self-directed member is limited to that same 80% to preserve cost neutrality. The total monthly cost of all services (traditional and self-directed services) cannot exceed the established aggregate monthly cost of the traditional services authorized.

If there is a need that goes beyond the budget amount and/or the waiver service limit, the member has the right to request a Waiver to Iowa Administrative Code (IAC). Waivers to (IAC) may be granted to the requestor when the member has needs beyond the limits expressed in the Iowa Administrative Code. For fee-for-service members

this decision is made by the Director of HHS, based on an evaluation of the member's needs in relation to the State's necessity to remain within the waiver's parameters of cost neutrality. The process to request a Waiver to (IAC) is shared on the HHS website as well as with the member when they apply for waiver services. In addition, any member has the right to appeal any decision made by HHS and to request an appeal hearing by an administrative law judge. The member is afforded the opportunity to request a fair hearing when the budget adjustment is denied or the amount of budget is reduced as described in F-1.

The MCOs operate an exception to policy process for their members. In the event an MCO denies an exception to policy and determines the member can no longer have his or her needs safely met through the 1915(c) waiver, the MCO is required to forward this information to HHS. In addition, MCO members have the right to appeal any decision made by the MCO and may appeal to the HHS once the MCO appeals process has been exhausted as described in F-1.

## Appendix E: Participant Direction of Services

### E-2: Opportunities for Participant-Direction (4 of 6)

#### b. Participant - Budget Authority

- iii. Informing Participant of Budget Amount.** Describe how the state informs each participant of the amount of the participant-directed budget and the procedures by which the participant may request an adjustment in the budget amount.

Members, regardless of delivery system (i.e., FFS members and MCO members) will be informed of their budget amount during the development of the service plan. The member can then make a final decision as to whether they want the self-direction option. If a member needs an adjustment to the budget, the member can request a review of the service plan.

As noted above, if there is a need that goes beyond the budget amount and/or the waiver service limit, the member has the right to request a Waiver to Iowa Administrative Code (IAC). In addition, any member has the right to appeal any decision. The member is afforded the opportunity to request a fair hearing when the budget adjustment is denied or the amount of budget is reduced as described in F-1.

MCO enrollees have the right to a State Fair Hearing after exhausting the MCO appeals process. It is the responsibility of the case manager or community based case manager to inform the member of the budget amount allowed for services before the service plan is completed.

## Appendix E: Participant Direction of Services

### E-2: Opportunities for Participant-Direction (5 of 6)

#### b. Participant - Budget Authority

- iv. Participant Exercise of Budget Flexibility.** *Select one:*

- ☐ Modifications to the participant directed budget must be preceded by a change in the service plan.
- ☒ The participant has the authority to modify the services included in the participant directed budget without prior approval.

Specify how changes in the participant-directed budget are documented, including updating the service plan. When prior review of changes is required in certain circumstances, describe the circumstances and specify the entity that reviews the proposed change:



or both fee-for-service and MCO members, once the monthly budget amount has been established, the member will develop a detailed monthly budget that identifies the goods and services that will be purchased and the employees that will be hired to meet the assessed needs of the member. This budget amount is the same amount whether the member utilizes only traditional waiver services, utilizes only self-directed services, or uses a combination of traditional and self-directed services. All services under the waiver add into the one budget and that budget maximum is determined by the member's level of care and not by the type of services accessed by the member.

Once the monthly budget amount has been established, the member will develop a detailed monthly budget that identifies the goods and services that will be purchased and the employees that will be hired to meet the assessed needs of the member. The budget is sent to the FMS to identify what goods and services are approved for purchase and the employees that will be submitting timecards to the FMS for payment. The member can modify services and adjust dollar amounts among line items in the individual budget without changing the service plan as long as it does not exceed the authorized budget amount. They must submit a new budget to the FMS that identifies the changes. The FMS must receive all modifications to the individual budget within the month when the changes occur and will monitor the new budget to assure the changes do not exceed the authorized budget amount. The Individual Support Broker and the FMS will both monitor to assure expenses are allowable expenses.

## Appendix E: Participant Direction of Services

### E-2: Opportunities for Participant-Direction (6 of 6)

#### b. Participant - Budget Authority

- v. Expenditure Safeguards.** Describe the safeguards that have been established for the timely prevention of the premature depletion of the participant-directed budget or to address potential service delivery problems that may be associated with budget underutilization and the entity (or entities) responsible for implementing these safeguards:

Self-direction budgets are authorized monthly. Members, regardless of delivery system (i.e., FFS members and MCO members), can make adjustments at any time within the authorized amount if services are not meeting their needs, and the ISB via the FFS or MCO delivery system is available to provide assistance. The ISB also routinely monitors expenses. The FMS also monitors the budget and notifies the ISB and the member immediately if claims are inconsistent with the budgeted amount or if the budget is consistently underutilized. When members chose self-direction, they sign a consent form that explains their rights and responsibilities, including consequences for authorizing payments over the authorized budget amount.

The following safeguards are in place to prevent premature depletion of participant's budget:

- Case manager and member or legal representative work together to create a service plan addressing person centered needs.
- Member selects services to be self-directed. This information is included in the service plan.
- Case manager authorized those services in the service plan.
- Member or legal representative signs service plan to indicate agreement with the plan.
- Case manager identifies CCO budget amount and provides the amount to the member or legal representative and Independent support broker (ISB).
- Member and the chosen ISB complete the CCO budget on the budget sheet , form 470-4431.
- Member or legal representative signs the budget sheet to indicate understanding and agreement.
- Budget sheet is forwarded to the FMS prior to the month of service identified on the budget.
- FMS staffs a call center to respond timely to member, legal representative and ISB questions about processes and remaining budget balances.
- The amount included on the budget form cannot exceed the authorized budget amount.

## Appendix F: Participant Rights

### Appendix F-1: Opportunity to Request a Fair Hearing

The state provides an opportunity to request a Fair Hearing under 42 CFR Part 431, Subpart E to individuals: (a) who are not

given the choice of home and community-based services as an alternative to the institutional care specified in Item 1-F of the request; (b) are denied the service(s) of their choice or the provider(s) of their choice; or, (c) whose services are denied, suspended, reduced or terminated. The state provides notice of action as required in 42 CFR §431.210.

**Procedures for Offering Opportunity to Request a Fair Hearing.** Describe how the individual (or his/her legal representative) is informed of the opportunity to request a fair hearing under 42 CFR Part 431, Subpart E. Specify the notice(s) that are used to offer individuals the opportunity to request a Fair Hearing. State laws, regulations, policies and notices referenced in the description are available to CMS upon request through the operating or Medicaid agency.

**FEE FOR SERVICE:**

Anyone has the right to appeal any decision made by the Department. The information on how to file an appeal is posted on the HHS Appeals webpage: <https://hhs.iowa.gov/appeals>.

All HHS application forms, notices, pamphlets and brochures contain information on the appeals process and the opportunity to request an appeal. This information is available at all of the local offices. The process for filing an appeal can be found on all Notices of Decision (NOD). Procedures regarding the appeal hearing can be found on the Notice of Hearing. As stated in Iowa Administrative Code, any person or group of persons may file an appeal with HHS concerning any decision made. The member is encouraged, but not required, to make a written appeal on a standard Appeal and Request a Hearing form. Appeals may also be filed via the HHS website. If the member is unwilling to complete the form, the member would need to request the appeal in writing.

An adverse benefit determination notice that results in members' right to appeal includes the following elements: the right to request a hearing, the procedure for requesting a hearing, the right to be represented by others at the hearing, unless otherwise specified by the statute or federal regulation, provisions for payment of legal fees by HHS; and how to obtain assistance, including the right to continue services while an appeal is pending.

The choice of HCBS vs. institutional services is discussed with the member at the time of the completion of the application by HHS income maintenance staff; and again at the time of the service plan development by the case manager, or community-based case manager.

All notices are kept at all local HHS Offices or the case manager or community-based case manager's file. The member is given their appeal rights in writing, which explains their right to continue with their current services while the appeal is under consideration. Copies of all notices for a change in service are maintained in the service file. Iowa Medicaid reviews this information during case reviews.

**MANAGED CARE ORGANIZATIONS:**

When an HCBS member is assigned to a specific MCO, the assigned MCO community-based case manager explains the member's appeal rights through the Fair Hearing process during the initial intake process.

In accordance with 42 CFR 438.400(b), an adverse benefit determination means any of the following:

- (1) The denial or limited authorization of a requested service, including determinations based on the type or level of service, requirements for medical necessity, appropriateness, setting, or effectiveness of a covered benefit.
- (2) The reduction, suspension, or termination of a previously authorized service.
- (3) The denial, in whole or in part, of payment for a service.
- (4) The failure to provide services in a timely manner, as defined by the State.
- (5) The failure of an MCO, PIHP, or PAHP to act within the timeframes provided in §438.408(b)(1) and (2) regarding the standard resolution of grievances and appeals.
- (6) For a resident of a rural area with only one MCO, the denial of an enrollee's request to exercise his or her right, under §438.52(b)(2)(ii), to obtain services outside the network.
- (7) The denial of an enrollee's request to dispute a financial liability, including cost sharing, copayments, premiums, deductibles, coinsurance, and other enrollee financial liabilities.

In accordance with 42 CFR 438.400, an appeal means a review by an MCO of an adverse benefit determination.

MCOs give their members written notice of all adverse benefit determinations, not only service authorization adverse benefit determinations, in accordance with state and federal rules, regulations and policies, including but not limited to 42 CFR 438. MCO enrollment materials must contain all information for appeals rights as delineated in 42 CFR 438.10, including: (A) the right to file an appeal; (B) requirements and timeframes for filing an appeal; (C) the availability of assistance in the filing process; (D) the right to request a State Fair Hearing after the MCO has made a determination of a member's internal MCO appeal which is adverse to the member. (E) The fact that, if requested by the member, benefits that the MCO seeks to reduce or terminate will continue if the member files an appeal or requests a State fair hearing within the specified timeframe and that the member may be required to pay the cost of such services furnished while the appeal or state fair hearing is pending if the final decision is adverse to the enrollee.

MCOs must provide members any reasonable assistance in completing forms and taking other procedural steps. This includes, but is not limited to providing interpreter services, and toll-free numbers that have adequate TTY/TTD and interpreter capability. Upon determination of the appeal, the MCO must ensure there is no delay in notification or mailing to the member and member representative the appeal decision. The MCO's appeal decision notice must describe the adverse benefit determinations taken,

the reasons for the adverse benefit determination, the member's right to request a State fair hearing, process for filing a fair hearing and other information set forth in 42 CFR 438.408(e).

MCOs must maintain an expedited appeals process when the standard time for appeal could seriously jeopardize the member's life, physical or mental health or ability to attain, maintain or regain maximum function. The MCO must also provide general and targeted education to members and providers regarding expedited appeals including when an expedited appeal is appropriate and procedures for providing written certification thereof.

The MCO's appeal process must conform to the following requirements:

- Allow members, or providers acting on the member's behalf, sixty (60) calendar days from the date of adverse benefit determination notice within which to file an appeal.
- In accordance with 42 CFR 438.402, ensure that oral requests seeking to appeal an adverse benefit determination are treated as appeals. However, an oral request for an appeal must be followed by a written request, per 441 IAC 73.12(2)a.
- The MCO must dispose of expedited appeals within 72 hours after the Contractor receives notice of the appeal, unless this timeframe is extended pursuant to 42 CFR 438.408 (c).
- In accordance with 42 CFR 438.410, if the MCO denies the request for an expedited resolution of a member's appeal, the MCO must transfer the appeal to the standard thirty (30) calendar day timeframe and give the member written notice of the denial within two (2) calendar days of the expedited appeal request. The MCO must also make a reasonable attempt to give the member prompt oral notice.
- The MCO must acknowledge receipt of each standard appeal within three (3) business days.
- The MCO must make a decision on standard, non-expedited, appeals within thirty (30) calendar days of receipt of the appeal. This timeframe may be extended up to fourteen (14) calendar days, pursuant to 42 CFR 438.408. If the timeframe is extended, for any extension not requested by the member, the MCO must give the member written notice of the reason for the delay.
- In accordance with 42 CFR 438.408, written notice of appeal disposition must be provided with citation of the Iowa Code and/or Iowa Administrative Code sections supporting the adverse benefit determination in non-authorization and care review letters that advise members of the right to appeal. For notice of an expedited resolution, the Contractor must also make reasonable efforts to provide oral notice. The written notice of the resolution must include the results of the resolution and the date it was completed. For appeals not resolved wholly in favor of the member, the written notice must include the right to request a State fair hearing, including the procedures to do so and the right to request to receive benefits while the hearing is pending, including instructions on how to make the request. The MCO shall direct the member to the Agency Appeal and Request for Hearing form as an option for submitting a request for an appeal. This shall also include notice that the member may be held liable for the cost of those benefits if the hearing upholds the Contractor's adverse benefit determination.

Members enrolled in an MCO must exhaust the entity's internal grievance processes before pursuing a State Fair Hearing. This requirement is outlined in the concurrent §1915(b) waiver, Part IV, Section E

## Appendix F: Participant-Rights

### Appendix F-2: Additional Dispute Resolution Process

**a. Availability of Additional Dispute Resolution Process.** Indicate whether the state operates another dispute resolution process that offers participants the opportunity to appeal decisions that adversely affect their services while preserving their right to a Fair Hearing. *Select one:*

- ☐ No. This Appendix does not apply
- ☒ Yes. The state operates an additional dispute resolution process

- **Description of Additional Dispute Resolution Process.** Describe the additional dispute resolution process, including: (a) the state agency that operates the process; (b) the nature of the process (i.e., procedures and timeframes), including the types of disputes addressed through the process; and, (c) how the right to a Medicaid Fair Hearing is preserved when a participant elects to make use of the process: State laws, regulations, and policies referenced in the description are available to CMS upon request through the operating or Medicaid agency.

Each MCO operates its own internal grievance and dispute resolution processes. In accordance to 42 CFR 438.408(f), a managed care enrollee may request a State Fair Hearing only after receiving notice that the MCO is upholding the adverse benefit determination.

The policies and procedures regarding the MCO grievance and appeals system are outlined in the concurrent §1915(b) waiver, Part IV, Section E. MCO members can appeal any adverse benefit determination within 60 calendar days.

An adverse benefit determination is defined as the: (i) denial or limited authorization of a requested service, including the type or level of service, requirements for medical necessity, appropriateness, setting, or effectiveness of a covered benefit; (ii) reduction, suspension or termination of a previously authorized service; (iii) denial, in whole or in part, of payment for a service; (iv) failure to provide services in a timely manner; (v) failure of the MCO to act within the required timeframes; or (vi) the denial of an enrollee's request to dispute a financial liability, including cost sharing, copayments, premiums, deductibles, coinsurance, and other enrollee financial liabilities. MCOs must ensure that oral requests seeking to appeal an adverse benefit determination are treated as appeals. However, an oral request for an appeal must be followed by a written request, unless the member or the provider requests an expedited resolution. MCOs must make a decision on standard, non-expedited, appeals within thirty (30) calendar days of receipt of the appeal. This timeframe may be extended up to fourteen (14) calendar days, pursuant to 42 C.F.R. § 438.408. Expedited appeals must be disposed within seventy-two (72) hours unless the timeframe is extended pursuant to 42 CFR § 438.408 and 410. MCO members can also file grievances with their MCO; grievances are any written or verbal expression of dissatisfaction about any matter other than an adverse benefit determination." MCO members have the right to request a State Fair Hearing if dissatisfied with the outcome of the MCO appeals process. MCOs notify members of this right through enrollment materials and notices of adverse benefit determination, including information that the MCO grievance and appeals process is not a substitute for a Fair Hearing. MCOs must acknowledge receipt of a grievance within three (3) business days and must make a decision on grievances and provide written notice of the disposition of grievance within thirty (30) calendar days of receipt of the grievance or as expeditiously as the member's health condition requires. This timeframe may be extended up to fourteen (14) calendar days, pursuant to 42 C.F.R. § 438.408.

## Appendix F: Participant-Rights

### Appendix F-3: State Grievance/Complaint System

#### a. Operation of Grievance/Complaint System. *Select one:*

- ☐ No. This Appendix does not apply
- ☒ Yes. The state operates a grievance/complaint system that affords participants the opportunity to register grievances or complaints concerning the provision of services under this waiver
- **Operational Responsibility.** Specify the state agency that is responsible for the operation of the grievance/complaint system:

**Fee For Service (FFS)**

Iowa Medicaid is responsible for operation of the complaint and grievance reporting process for all fee-for-service members. In addition, the Department maintains an HCBS QIO contract that is responsible for the handling of fee-for-service member complaints and grievances in regard to provision of services under this waiver.

**MANAGED CARE ORGANIZATIONS (MCO):**

Iowa Medicaid Member Services MCO Member and MCO Liaison: Designated Iowa Medicaid Member Services staff serves as a liaison for any MCO grievance/complaint that is reported to Iowa Medicaid Policy staff by an MCO member or his/her advocate. Iowa Medicaid Policy sends the pertinent details of the grievance/complaint to the MCO liaison. The Iowa Medicaid MCO liaison communicates and coordinates with the MCO and member to grievance/complaint to resolution; and the resolution is communicated to the Iowa Medicaid Policy staff who received the original grievance/complaint. This process serves to support those MCO members who may be confused about the MCO grievance/complaint process to follow or members who have not been able to resolve their grievance/complaint with their MCOs.

Grievances/complaints follow the parameters and timelines in accordance with 42 CFR 438.408 and 438.410.

A grievance/complaint means an expression of dissatisfaction about any matter other than an adverse benefit determination. Grievances may include, but are not limited to, the quality of care or services provided, and aspects of interpersonal relationships such as rudeness of a provider or employee, or failure to respect the enrollee's rights regardless of whether remedial action is requested. Grievance includes an enrollee's right to dispute an extension of time proposed by the MCO to make an authorization decision.

**MCO Grievance/Complaint System:**

The MCO must provide information about its grievance/complaint system to all providers and subcontractors at the time they enter into a contract. Further, the MCO is responsible for maintenance of grievance records in accordance with 42 CFR 438.416.

The MCO must provide information about its grievance/complaint system to all members and provide reasonable assistance in completing forms and taking procedural steps. This responsibility also includes but is not limited to, auxiliary aids and services upon request (e.g. interpreter services and toll-free numbers that have TTY/TTD and interpreter capability).

The MCO member handbook must include information, consistent with 42 CFR 438.410.

The MCO must ensure that individuals who make decisions on grievances have not been involved in any previous level of review or decision-making and is not a subordinate of such individual.

**MCO Grievance/Complaint Process:**

A member may submit an oral or written grievance at any time to the MCO. With written consent of the member, a provider or an authorized representative may file a grievance on behalf of a member. There is not a timeline for submission.

The MCO must acknowledge receipt of the grievance.

The MCO must process the grievance resolution within 30 days of the date that the grievance is received and issue a written notification to the member in accordance with 42 CFR 438.408.

The resolution may be extended by fourteen (14) days upon member request. If the member does not request an extension, the MCO must make reasonable efforts to give the member prompt oral notice of the delay; and within two (2) calendar days provide the member with a written notice of the basis for the decision to extend the timeframe. If the member does not agree with the extension, he/she may file an additional grievance to the extension

- **Description of System.** Describe the grievance/complaint system, including: (a) the types of grievances/complaints that participants may register; (b) the process and timelines for addressing grievances/complaints; and, (c) the mechanisms that are used to resolve grievances/complaints. 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).

Any fee-for-service waiver member, member's relative/guardian, agency staff, concerned citizen or other public agency staff may report a complaint regarding the care, treatment, and services provided to a member. A complaint may be submitted in writing, in person, by e-mail or by telephone. Verbal reports may require submission of a detailed written report. The complaint may be submitted to an HCBS QIO Specialist, HCBS Program Manager, any Iowa Medicaid Unit, or Bureau Chief of LTSS. Complaints by phone can be made to a regional HCBS QIO Specialist at their local number or by calling Iowa Medicaid. The Bureau of Long-Term Service and Supports (LTSS) has established a HCBS Quality committee to review HCBS performance which includes review of complaints.

Once received, the HCBS QIO shall initiate investigation within one business day of receipt and shall submit a findings report to the Quality Assurance Manager within 15 days of finalizing the investigation. Once approved by the Quality Assurance Manager, the findings report is provided to the complainant and the provider in question. If the complainant is a member, they are informed by the HCBS QIO Incident and Complaint Specialist that filing a grievance or making a complaint is not a pre-requisite or substitute for a Fair Hearing.

MCO members must exhaust the entity's internal grievance and appeals processes before pursuing a State Fair Hearing. The policies and procedures regarding the MCO grievance and appeals system are outlined in the concurrent §1915(b) waiver, Part IV, Section E. MCO members can appeal any "action" within 60 days. An "action" is defined as the: (i) denial or limited authorization of a requested service, including the type or level of service; (ii) reduction, suspension or termination of a previously authorized service; (iii) denial, in whole or in part, of payment for a service; (iv) failure to provide services in a timely manner; or (v) failure of the MCO to act within the required timeframes set forth in 42 CFR 438.408(b). In accordance with 42 CFR 438.406, oral requests seeking an appeal are treated by the MCO as an appeal; however, an oral request for an appeal must be followed by a written request, unless the member or the provider requests an expedited resolution.

MCO members have the right to request a State Fair Hearing if dissatisfied with the outcome of the MCO appeals process. MCOs notify members of this right through enrollment materials and notices of action. In accordance with 42 CFR 438.406, the MCO provides the member and their representative opportunity, before and during the appeals process, to examine the member's case file, including medical records and any other documents or records considered during the appeals process. In addition, the member and their representative have the opportunity to present evidence and allegations of fact or law in person as well as in writing. Upon determination of the appeal, the MCO must promptly notify the member and his/her representative of the appeal decision. The MCO's appeal decision notice must describe the actions taken, the reasons for the action, the member's right to request a State Fair Hearing, process for filing a Fair Hearing and other information set forth in 42 CFR 438.408(e).

MCOs must ensure that the individuals rendering decisions on grievances and appeals were not involved in previous levels of review or decision-making and are health care professionals with appropriate clinical expertise in treating the member's condition or disease if the decision will be in regard to any of the following: (i) an appeal of a denial based on lack of medical necessity; (ii) a grievance regarding denial of expedited resolution of an appeal; or (iii) any grievance or appeal involving clinical issues. Appeals must be resolved by the MCO within 30 calendar days of receipt; this timeframe may be extended up to 14 calendar days, pursuant to 42 CFR 438.408(c).

MCOs must resolve appeals on an expedited basis when the standard time for appeal could seriously jeopardize the member's health or ability to maintain or regain maximum function. Such expedited appeals must be resolved within 72 hours after the MCO receives notice of the appeal, unless this timeframe is extended pursuant to 42 CFR 438.408 (c).

Standard appeals must be resolved within 30 calendar days; this timeframe may be extended up to 14 calendar days, pursuant to 42 CFR 438.408(c). If the timeframe is extended, for any extension not requested by the member, the Contractor must give the member written notice of the reason for the delay. Within 90 calendar days of the date of notice from the MCO on the appeal decision, the member may request a State Fair Hearing.

MCO members can also file grievances with their MCO; grievances are any written or verbal expression of dissatisfaction about any matter other than an "action," as defined above. Grievances may be filed either orally or in writing; receipt is acknowledged by the MCO within 3 business days and resolved within 30 calendar days or as expeditiously as the member's health condition requires. This timeframe may be extended up to 14 calendar days, pursuant to 42 CFR 438.408(c).

MCOs are required to track all grievances and appeals in their information systems; this includes data on clinical reviews,

appeals, grievances and complaints and their outcomes. MCOs are responsible for reporting on grievances and appeals to HHS. This includes maintenance and reporting to the State the MCO member grievance and appeals logs which includes the current status of all grievances and appeals and processing timelines.

## Appendix G: Participant Safeguards

### Appendix G-1: Response to Critical Events or Incidents

**a. Critical Event or Incident Reporting and Management Process.** Indicate whether the state operates Critical Event or Incident Reporting and Management Process that enables the state to collect information on sentinel events occurring in the waiver program.*Select one:*

☒ **Yes. The state operates a Critical Event or Incident Reporting and Management Process** (*complete Items b through e*)

☐ **No. This Appendix does not apply** (*do not complete Items b through e*)

If the state does not operate a Critical Event or Incident Reporting and Management Process, describe the process that the state uses to elicit information on the health and welfare of individuals served through the program.

**b. State Critical Event or Incident Reporting Requirements.** Specify the types of critical events or incidents (including alleged abuse, neglect and exploitation) that the state requires to be reported for review and follow-up action by an appropriate authority, the individuals and/or entities that are required to report such events and incidents and the timelines for reporting. State laws, regulations, and policies that are referenced are available to CMS upon request through the Medicaid agency or the operating agency (if applicable).



All waiver service providers, case managers, and MCO CBCMs, regardless of delivery system (i.e., FFS or managed care), are required to document major and minor incidents and make the incident reports and related documentation available to HHS upon request. Providers, case managers, and MCO CBCMs must also ensure cooperation in providing pertinent information regarding incidents as requested by HHS. MCOs must require that all internal staff and network providers report, respond to, and document critical incidents, as well as cooperate with any investigation conducted by the MCO or outside agency, all in accordance with State requirements for reporting incidents for 1915(c) HCBS Waivers, 1915(i) Habilitation Program, PMICs, and all other incidents required for licensure of programs through the Department of Inspections and Appeals.

Major incident is defined as an occurrence that involves a member who is enrolled in an HCBS waiver, targeted case management, or habilitation services and that:

- results in a physical injury to or by the member that requires a physician's treatment or admission to a hospital,
- results in the death of the member, including those resulting from known and unknown medical conditions,
- results in emergency mental health treatment for the member, (EMS, Crisis Response, ER visit, Hospitalization)
- results in medical treatment for the member, (EMS, ER Visit, Hospitalization)
- results in the intervention of law enforcement, including contacts, arrests, and incarcerations,
- results in a report of child abuse pursuant to Iowa Code section 232.69 or a report of dependent adult abuse pursuant to Iowa Code section 235B.3,
- constitutes a prescription medication error or a pattern of medication errors that leads to the outcome in bullets 1, 2, 3, 4, 5, and 6 above
- involves a member's provider staff, who are assigned protective oversight, being unable to locate the member or
- involves a member leaving the program against court orders, or professional advice
- involves the use of physical or chemical restraint or seclusion of the member

All major incidents must be reported by the end of the next calendar day after the incident has occurred using the Iowa Medicaid Portal Access (IMPA) System. Suspected abuse or neglect may be reported to the statewide abuse reporting hotline operated by HHS.

Child and dependent adult abuse is an inclusive definition that includes physical and sexual abuse, neglect and exploitation. Child abuse is defined in Iowa Code 232.68, and may include any of the following types of acts of willful or negligent acts or omissions:

- Any non-accidental physical injury.
- Any mental injury to a child's intellectual or psychological capacity.
- Commission of a sexual offense with or to a child.
- Failure on the part of a person responsible for the care of a child to provide adequate food, shelter, clothing or other care necessary for the child's health and welfare.
- The acts or omissions of a person responsible for the care of a child which allow, permit, or encourage the child to engage in prostitution.
- Presence of an illegal drug in a child's body as a direct act or omission of the person responsible for the care of a child or is using, manufacturing, cultivating, or distributing a dangerous substance in the presence of a child.
- The commission of bestiality in the presence of a minor.
- A person who is responsible for the care of a child knowingly allowing another person custody of, control over, or unsupervised access to a child under the age of fourteen or a child with a physical or mental disability, after knowing the other person is required to register or is on the sex offender registry.
- The person responsible for the care of the child has knowingly allowed the child access to obscene material or has knowingly disseminated or exhibited such material to the child.
- The recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a child for the purpose of commercial sexual activity.

Dependent adult abuse is defined in Iowa Code 235B.2, and may include any of the following types of acts of willful or negligent acts or omissions:

- Physical injury or unreasonable confinement, unreasonable punishment, or assault of a dependent adult.
- Commission of a sexual offense or sexual exploitation.
- Exploitation of a dependent adult which means the act or process of taking unfair advantage of a dependent adult or the adult's physical or financial resources, without the informed consent of the dependent adult, including theft, by the use of undue influence, harassment, duress, deception, false representation, or false pretenses.
- Deprivation of the minimum food, shelter, clothing, supervision, physical or mental health care or other care necessary

to maintain a dependent adult's life or health.

-Personal degradation of a dependent adult by a caretaker. "Personal degradation" means a willful act or statement by a caretaker intended to shame, degrade, humiliate, or otherwise harm the personal dignity of a dependent adult, or where the caretaker knew or reasonably should have known the act or statement would cause shame, degradation, humiliation, or harm to the personal dignity of a reasonable person.

When a major incident occurs, provider staff must notify the member or the member's legal guardian within 24 hours of the incident and distribute a complete incident report form as follows:

- Forward a copy to the supervisor with 24 hours of the incident.
- Send a copy of the report to the member's case manager, or community-based case manager (when applicable) and the BLTC within 24 hours of the incident.
- File a copy of the report in a centralized location and make a notation in the member's file.

Per Chapter 441 Iowa Administrative Code Chapter 77, "minor incidents" are defined as an occurrence involving a member who is enrolled in an HCBS waiver, targeted case management, or habilitation services, and that is not a major incident and that: (1) results in the application of basic first aid; (2) results in bruising; (3) results in seizure activity; (4) results in injury to self, to others, or to property; or (5) constitutes a prescription medication error.

Providers are not required to report minor incidents to the BLTSS, and reports may be reported internally within a provider's system, in any format designated by the provider (i.e., phone, fax, email, web based reporting, or paper submission). When a minor incident occurs or a staff member becomes aware of a minor incident, the staff member involved must submit the completed incident report to the staff member's supervisor within 72 hours of the incident. The completed report must be maintained in a centralized file with a notation in the member's file.

As part of the quality assurance policies and procedures for HCBS Waivers, all incidents will be monitored and remediated by the HCBS Incident Reporting Specialist and HCBS specialists. On a quarterly basis, a QA committee will review data collected on incidents and will analyze data to determine trends, problems and issues in service delivery and make recommendations of any policy changes.

MCOs are also required to develop and implement a critical incident management system in accordance with HHS requirements, in addition to maintaining policies and procedures that address and respond to incidents, remediate the incidents to the individual level, report incidents to the appropriate entities per required timeframes, and track and analyze incidents.

MCOs must adhere to the State's quality improvement strategy described in each HCBS waiver and waiver-specific methods for discovery and remediation. MCOs must utilize system information to identify both case-specific and systemic trends and patterns, identify opportunities for improvement and develop and implement appropriate strategies to reduce the occurrence of incidents and improve the quality of care. All MCO staff and network providers are required to:

- Report critical incidents.
- Respond to critical incidents.
- Document critical incidents.
- Cooperate with any investigation conducted by the HCBS QIO staff, MCO, or outside agency.
- Receive and provide training on critical incident policies and procedures.
- Be subject to corrective action as needed to ensure provider compliance with critical incident requirements.

Finally, MCOs must identify and track critical incidents, and review and analyze critical incidents, to identify and address quality of care and/or health and safety issues, including a regular review of the number and types of incidents and findings from investigations. This data should be used to develop strategies to reduce the occurrence of critical incidents and improve the quality of care delivered to members.

**c. Participant Training and Education.** Describe how training and/or information is provided to participants (and/or families or legal representatives, as appropriate) concerning protections from abuse, neglect, and exploitation, including how participants (and/or families or legal representatives, as appropriate) can notify appropriate authorities or entities when the participant may have experienced abuse, neglect or exploitation.

Information concerning protections is provided to applicants and members at the time of application and at the time of service plan development. During enrollment, and when any updates are made, HHS also provides to members a Medicaid Members Handbook, which contains information regarding filing a complaint or grievance. MCO written member enrollment materials also contain information and procedures on how to report suspected abuse and neglect, including the phone numbers to call to report suspected abuse and neglect.

In addition, information can also be found on HHS and MCO websites. The HHS website contains a “Report Abuse and Fraud” section, which describes how to report dependent adult child abuse. The same information is also available in written format in all of the local HHS offices, and members may also call Iowa Medicaid Member Services call center with any questions regarding filing a complaint or grievance.

Finally, the case manager or community-based case manager is responsible for assessing a member’s risk factors annually during the reevaluation process, as well as during the quality assurance interview process. The state has developed training to ensure that case managers and community-based case managers provide this information to members at a minimum on a yearly basis.

- d. Responsibility for Review of and Response to Critical Events or Incidents.** Specify the entity (or entities) that receives reports of critical events or incidents specified in item G-1-a, the methods that are employed to evaluate such reports, and the processes and time-frames for responding to critical events or incidents, including conducting investigations.

Reporting of suspected child or adult abuse to HHS Protective Services is mandatory for all Iowa Medicaid HCBS staff, case managers, MCO CBCMs, and HCBS providers. HHS Protective Services (PS) receives all mandatory reports of child and dependent adult abuse. HHS PS act in accordance with their rules for investigation of suspected adult or child abuse located at 441 IAC 175 and 441 IAC 176. This applies to both individuals enrolled in fee-for-service or managed care.

If the incident is a situation that has caused, or is likely to cause a serious injury, impairment, or abuse to the member, and if PS has completed, or is in the process of conducting, an investigation the HCBS specialist coordinates activities with PS to ensure the safety of the member is addressed. If PS is not investigating, and immediate jeopardy remains, the member's case manager or community-based case manager is notified immediately to coordinate services, and the HCBS Specialist initiates a review within two working days of receipt of the report. If it is determined that immediate jeopardy has been removed or not present, review by the HCBS Specialist is initiated within twenty working days of receipt of report. The HCBS Specialist prepares a report of findings within thirty days of the investigation being completed. These timelines apply to both individuals enrolled in fee-for-service or managed care.

"The HCBS incident and complaint specialists refers any untimely, incomplete, or inaccurate CIR or CIR missing root cause, immediate resolution or long-term remediation to the reporter or the reporter's supervisor as applicable. A pattern or trend of issues, inappropriate or ineffective root causes, immediate resolutions, or long-term remediations may require follow-up technical assistance with the reporter or reporter's supervisor, as applicable. Patterns to look for include but are not limited to:

- Patterns in the timing of incidents (i.e., at transition times, evenings, mornings, when the member is unsupervised, mealtimes.)
- Patterns in root cause- events leading up to the incident or that may have caused the incident.
- Patterns in the type of incident or issue.
- Patterns in staff or others involved.

Technical assistance may be provided by the HCBS incident and complaint specialist or a regional HCBS specialist.

Iowa Medicaid reviews critical incident reports quarterly to identify trends and patterns as well as identification of root cause and to ensure that remediation has occurred at both the individual and systemic level. HHS QIO reviews and if needed, requests additional information regarding the resolution of critical incidents. Requests for information are forwarded to the case manager or community-based case manager to verify and provide needed information and confirm that follow-up has occurred with the member (i.e., changes to a plan of care or the safety or risk plan as necessary). If additional information or actions are required of a provider, the HCBS Specialist works directly with the provider to ensure that performance issues identified in the incident report are addressed. The HCBS Specialist uses the provider's Self-Assessment as the foundation of the review to assure that accuracy in the Self-Assessment and to identify any corrective actions that may be required. The HCBS Specialist generates a report of findings within thirty days of the completion of any review requiring corrective actions. Information requests to the case manager, community-based case manager, or HCBS Specialist for follow up are tracked by the HCBS Unit on a weekly basis until the situation has been resolved. HHS uses a web-based critical incident reporting system, that enhances the State's ability to track and trend the discovery, remediation, and improvement of the critical incident reporting process. When needed, revisions are made to the system based on data collection and feedback from users, further enhancing the process. Incidents are reviewed by the HCBS QIO within one business day of report and forwarded to the case manager, or community-based case manager as needed to coordinate any follow-up and communication with the member, provider, and/or family/legal guardian. Incidents that lead to targeted review will initiate investigation by the HCBS QIO within one business day. Findings reports are submitted to the QIO Manager within 15 days of investigation completion. Once the finding report is approved by the Quality Assurance Manager, the findings report is sent to the provider and case manager, community-based case manager, or HCBS Specialist.

MCOs are responsible for developing and implementing critical incident management systems in accordance with the HHS requirements. Specifically, MCOs must maintain policies and procedures, subject to HHS review and approval, that: (1) address and respond to incidents; (2) report incidents to the appropriate entities per required timeframes; and (3) track and analyze incidents. This information is utilized to identify both case-specific and systemic trends and patterns, identify opportunities for improvement and develop and implement appropriate strategies to reduce the occurrence of incidents and improve the quality of care. Training must be provided to all internal staff and network providers regarding the appropriate procedures for reporting, responding to, and documenting critical incidents. Network providers must provide training to direct care staff regarding the appropriate procedures for reporting, responding to, and documenting

critical incidents.

Finally, MCOs must identify and track, review and analyze critical incidents to identify and address quality of care and/or health and safety issues. MCOs must also regularly review the number and types of incidents and findings from investigations, in order to identify trends, patterns, and areas for improvement. Based on these findings, the MCO must develop and implement strategies to reduce the occurrence of critical incidents and improve the quality of care delivered to members. Consistent with 441 Iowa Administrative Code 77.41(12)c., the following process is followed when a major incident occurs or a staff member becomes aware of a major incident:

(1) The staff member involved shall notify the following persons of the incident by the end of the next calendar day after the incident:

- a. The staff member's supervisor.
- b. The member or the member's legal guardian. EXCEPTION: Notification to the member is required only if the incident took place outside of the provider's service provision. Notification to a guardian, if any, is always required.
- c. The member's case manager.

(2) By the end of the next calendar day after the incident, the staff member who observed or first became aware of the incident shall also report as much information as is known about the incident to the member's managed care organization in the format defined by the managed care organization. If the member is not enrolled with a managed care organization, the staff member shall report the information to the department's bureau of long-term care either:

- a. By direct data entry into the Iowa Medicaid Provider Access System, or
- b. By faxing or mailing Form 470-4698, Critical Incident Report, according to the directions on the form.

(3) The following information shall be reported:

- a. The name of the member involved.
- b. The date and time the incident occurred.
- c. A description of the incident.
- d. The names of all provider staff and others who were present at the time of the incident or who responded after becoming aware of the incident. The confidentiality of other waiver-eligible or non-waiver-eligible consumers who were present must be maintained by the use of initials or other means
- e. The action that the provider staff took to manage the incident.
- f. The resolution of or follow-up to the incident.
- g. The date the report is made and the handwritten or electronic signature of the person making the report.

If the critical incident involves the report of child or dependent adult abuse, it is mandatory that this type of critical incident is reported to HHS Protective Services.

If the critical incident does not involve child or dependent adult abuse, it will be reviewed by the MCO. The MCO will notify the member and/or the family of the results upon conclusion of the investigation, on or within 30 days

If the member is not with an MCO, the FFS case manager will notify the member, guardian, and or legal representative, verbally or in writing, of the results upon conclusion of the investigation, on or within 30 days.

- e. Responsibility for Oversight of Critical Incidents and Events.** Identify the state agency (or agencies) responsible for overseeing the reporting of and response to critical incidents or events that affect waiver participants, how this oversight is conducted, and how frequently.

HHS has oversight for monitoring incidents that affect all waiver members. The HCBS QIO reviews all critical incident reports as soon as they are reported to HHS. All critical incidents are tracked in a critical incident database that tracks the date of the event, the specific waiver the member is enrolled in, the provider (if applicable), and the nature of the event, and follow up provided. If the incident has caused or is likely to cause a serious injury, impairment, or abuse to the member, and if PS has completed or is in the process of conducting an investigation, the HCBS Specialist will coordinate with PS. If PS is not investigating, the HCBS Specialist will begin an on-site review within two working days of receipt of the report. If it is determined that the member has been removed from immediate jeopardy, the review is initiated within twenty working days of receipt of report. For other non-jeopardy incidents, a review is initiated within twenty days.

The HCBS QIO meets biweekly to review data tracked in the critical incident database and to decide if policy changes or additional training are needed. Data is compiled and analyzed in attempt to prevent future incidents through identification of system and provider specific training needs, and individual service plan revisions.

## Appendix G: Participant Safeguards

### Appendix G-2: Safeguards Concerning Restraints and Restrictive Interventions (1 of 3)

- a. Use of Restraints.** *(Select one): (For waiver actions submitted before March 2014, responses in Appendix G-2-a will display information for both restraints and seclusion. For most waiver actions submitted after March 2014, responses regarding seclusion appear in Appendix G-2-c.)*

☐ **The state does not permit or prohibits the use of restraints**

Specify the state agency (or agencies) responsible for detecting the unauthorized use of restraints and how this oversight is conducted and its frequency:

☒ **The use of restraints is permitted during the course of the delivery of waiver services.** Complete Items G-2-a-i and G-2-a-ii.

- i. Safeguards Concerning the Use of Restraints.** Specify the safeguards that the state has established concerning the use of each type of restraint (i.e., personal restraints, drugs used as restraints, mechanical restraints). State laws, regulations, and policies that are referenced are available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

The HHS policy regarding restraints is as follows and applies to all types of restraints that may be used by waiver providers. The policy described in this section applies regardless of delivery system (i.e., FFS or MCO), and MCOs are contractually obligated to adhere.

Restraints include, but are not limited to, personal, chemical, and mechanical methods used for the purpose of controlling the free movement of an individual's body. Chemical restraints are most commonly used to calm an individual down in moments of escalation. Other examples of restraints include, but are not limited to, holding a person down with one's hands, tying an individual to a bed, using a straight jacket or demobilizing wrap. As a rights limitation, the restraint procedures must be agreed to by the interdisciplinary team and identified in the member's plan of care (441 Iowa Administrative Code Chapter 83). All incidents of restraints must be documented in a member's file and reported as a critical incident.

Per 441 Iowa Administrative Code Chapter 77, providers "shall have in place a system for the review, approval, and implementation of ethical, safe, humane, and efficient behavioral intervention procedures. All members receiving home- and community-based habilitation services shall be afforded the protections imposed by these rules when any restraint, restriction, or behavioral intervention is implemented.

- The system shall include procedures to inform the member and the member's legal guardian of the restraint, restriction, and behavioral intervention policy and procedures at the time of service approval and as changes occur.
- Restraint, restriction, and behavioral intervention shall be used only for reducing or eliminating maladaptive target behaviors that are identified in the member's restraint, restriction, or behavioral intervention program.
- Restraint, restriction, and behavioral intervention procedures shall be designed and implemented only for the benefit of the member and shall never be used as punishment, for the convenience of the staff, or as a substitute for a nonaversive program.
- Restraint, restriction, and behavioral intervention programs shall be time-limited (maximum one year) and shall be reviewed at least quarterly.
- Corporal punishment and verbal or physical abuse are prohibited."

These safeguards are the same regardless of what restraints are used. All restraints must also be consistent with the Children's Health Act of 2000 and other applicable Federal laws. All members served under an HCBS waiver service shall be afforded the protections imposed by these requirements. Any provider contracting with HHS to provide waiver services must conduct its activities in accordance with these requirements. Restraint procedures may be designed and implemented only for the benefit of the member and may never be used merely as punishment or for the convenience of the staff or as a substitute for a non-aversive program.

Physical and chemical restraints may be allowed depending on the provider's agency policy to ensure that there is an accompanying behavioral intervention plan, documentation of each instance, and monitoring of its use. These types of restraints must be considered on an individual basis after the interdisciplinary team reviews them, and entered into the written plan of care with specific timelines. If a member were placed in a closed room the time frame would need to be determined on an individual basis and spelled out in the service plan. The provider would need to document the use of this restraint in the member's service file each time it was utilized by staff. The provider would be required to have a written policy approved by HHS on the supervision and monitoring of members placed in a closed room, for example monitoring on a fifteen-minute basis to assure the health and welfare of the member.

Restraint procedures may only be used for reducing or eliminating maladaptive target behaviors that are identified in the member's Behavioral Intervention Program. For the purposes of decelerating maladaptive target behaviors a Behavioral Intervention Program includes at least the following components:

- A clear objective description of the maladaptive target behavior to be reduced or eliminated.
  - A clear objective description of the incompatible or alternative appropriate response, which will be reinforced.
  - A list of restraints and behavioral interventions utilized to teach replacement behaviors that serve the same behavioral function identified through a functional analysis or review of the maladaptive target behaviors.
- Restraints and behavioral interventions may only be utilized to teach replacement behaviors when non-

aversive methods of positive support have been ineffective.

- A baseline measurement of the level of the target behavior before intervention.

Any provider employee who implements an aversive procedure must be able to carry out the procedure as it is written. Staff must be trained and exhibit proficiency as described below before administering restraints. An employee's ability to implement a procedure must be documented in one of the following ways:

- A program staff person may observe each employee in a role-play situation in order to document his or her ability to implement the procedure as written.
- Supervisory personnel from the provider may provide documentation of employees' ability to implement a procedure if the following conditions are met: (i) the supervisor's ability to implement the procedure has been documented by a program staff person; (ii) the supervisor observes each employee in a role play situation and documents the employee's ability to implement the procedure; and (iii) the provider maintains a list of those employees who have been observed and are considered capable of implementing the procedure. The list should specify the dates that an employee demonstrated competency and the name of staff that certified the employee.
- Implementation of a program to alter an individual's behaviors.

Restraints and behavioral intervention procedures must be implemented by systematic program review. It must ensure that a member's right to be free from aversive, intrusive procedures is balanced against the member's interests in receiving services and treatment whenever a decision regarding the use of aversive procedures is made. Any decision to implement a program to alter a member's behavior must be made by the interdisciplinary team and the program must be described fully as a Behavioral Intervention Program incorporated into the member's service plan and the case manager or community-based case manager's plan of care. In general, the Behavioral Intervention Program must meet the following minimum requirements:

- Show that previous attempts to modify the maladaptive target behavior using less restrictive procedures have not proven to be effective, or the situation is so serious that a restrictive procedure is immediately warranted.
- The proposed procedure is a reasonable response to the member's maladaptive target behavior.
- Emphasize the development of the functional alternative behavior and positive approaches and positive behavior intervention.
- Use the least restrictive intervention possible.
- Ensure the health and safety of the individual and that abusive or demeaning intervention is expressly prohibited.
- Be evaluated and approved by the interdisciplinary team through quarterly reviews of specific data on the progress and effectiveness of the procedures.

Documentation regarding the behavior program must include:

- A Restraint and Behavioral Intervention Program that is a part of the written individual service plan developed by the member's case manager or community-based case manager, and in the provider plan of care developed for the member.
- Approval by the member's interdisciplinary team, with the written consent of the member's parent if the member is under eighteen years of age, or the member's legal guardian if one has been appointed by the court.
- A written endorsement from a physician for any procedure that might affect the member's health.
- A functional analysis that is defined as, and includes, the following components: (i) clear, measurable description of the behavior to include frequency, duration, intensity and severity of the behavior; (ii) clear description of the need to alter the behavior; an assessment of the meaning of the behavior, which includes the possibility that the behavior is an effort to communicate, the result of medical conditions or environmental causes; or the result of other factors; (iii) description of the conditions that precede the behavior in question; (iv) description of what appears to reinforce and maintain the behavior; and (v) a clear and measurable procedure, which will be used to alter the behavior and develop the functional alternative behavior.
- Documentation that the member, the guardian, and interdisciplinary team are fully aware of and consent to the program in accordance with the interdisciplinary process.
- Documentation of all prior programs used to eliminate a maladaptive target behavior.
- Documentation of staff training.



Behavioral Intervention Programs shall be time limited and reviewed at least quarterly. Restraints must be considered on an individual basis after they are reviewed by the interdisciplinary team and entered into the written plan of care with specific time lines. All restraints are explained to the member and their legal representative and agreed upon ahead of time.

Unauthorized use of restraints would be detected via:

- interviews with the member, their family and staff and case manager or community-based case manager;
- through review of critical incident reports by HHS and member's case manager or community-based case manager on a daily basis;
- HHS and case manager or community-based case manager review of written documentation authored by provider staff;
- through the annual review activities associated with the provider Self-Assessment process;
- and by reports from any interested party (complaints).

Reviews may include desk reviews where the department requests member's records to be reviewed or onsite where the department or department designee goes onsite to review documentation. One hundred percent of waiver providers are reviewed at least once every five years to ensure that the HHS policy for each type of agency identified restraint is observed and member rights are safeguarded. If it is found that a waiver provider is not observing HHS policy or ensuring a member's rights, adverse action is taken by Iowa Medicaid, which may include sanction, termination, required corrective action, etc.

The member's case manager or community-based case manager is responsible to monitor individual plans of care including the use of restraints and behavioral interventions.

- ii. State Oversight Responsibility.** Specify the state agency (or agencies) responsible for overseeing the use of restraints and ensuring that state safeguards concerning their use are followed and how such oversight is conducted and its frequency:

The first line of responsibility for overseeing the use of restraints and ensuring safeguards are in place is the member's case manager or community-based case manager. The use of restraints must be assessed as needed and identified in the individual member's service plan. The use of restraints would also require the development and implementation of a behavior plan and the plan would be included in the member's service plan. The case manager or community-based case manager is responsible for monitoring the service plan to assure that supports and

services in the service plan are being implemented as identified in the service plan. Any issues with the use of restraints would be addressed with the provider of service and corrected as needed.

The State also contracts with the HCBS QIO to oversee the appropriateness, provider policies and procedures, and service plan components associated with restraints. The Unit conducts periodic reviews of 100% of enrolled waiver service providers to ensure that policies and procedures are consistent with State and federal rule, regulations, and best practices. Further, the Unit examines member files, and conducts targeted reviews based on complaints, to ascertain whether restraints are appropriately incorporated into the service plan, such that restraints are only implemented as designated in the plan (who, what, when, where, why, and how). If the Unit discovers that the provider is less than compliant, the provider is required to complete a corrective action plan (CAP) and implement the CAP to 100% compliance. If it is found that the circumstances are more serious, recommendations are made to PS and possible sanctions (suspension, probation, termination, etc.) may apply.

All waiver service providers are required to submit major incident reports. Categories within the incident report include inappropriate use of restraints. For fee-for-service members these reports are entered into IMPA, triggering milestones in IoWANS that alert case managers and prompting the HCBS Incident Reporting Specialist to conduct a review of the incident. If it is found that the incident demands further investigation, the issue is passed to the Unit for a targeted review. If the Unit discovers that the provider is less than compliant in areas surrounding the use of restraints, the provider is required to complete a corrective action plan (CAP) and implement the CAP to 100% compliance. If it is found that the circumstances are more serious, recommendations are made to PS and possible sanctions (suspension, probation, termination, etc.) may apply.

The HCBS Quality Oversight Unit is also responsible for conducting the HCBS CAHPS survey with waiver participants. The HCBS Quality Oversight Unit conduct interviews either face-to-face or via telephone, to the discretion of the member. All waiver members have the right to decline interview. The results of these interviews are presented to the state on a quarterly basis. The HCBS Specialists conducting CAHPS interviews conduct individual remediation to flagged questions. In the instance that a flagged question/response occurs, the Specialist first seeks further clarification from the member and provides education when necessary. Following the interview, the case manager is notified and information regarding remediation is required within 30 days. This data is stored in a database and reported to the state on a quarterly and annual basis. MCO are responsible for research and follow up to flagged responses. General methods for problem correction at a systemic level include informational letters, provider trainings, collaboration with stakeholders and changes to provider policy.

Finally, the Unit compiles all data related to incidents reported in IMPA associated with the inappropriate use of restraints, as well as data from periodic and targeted provider reviews conducted by the Unit. Data is analyzed to identify trends and patterns and reported on a monthly and quarterly basis to HHS. Trends are used, along with those established in the monthly HCBS QA Committee, to guide the dissemination of Informational Letters and revisions to State Administrative Rules.

MCO community-based case managers are responsible for monitoring service plans to assure that supports and services in the service plan are being implemented as identified in the service plan. Any issues with the use of restraints would be addressed with the provider of service and corrected as needed. In addition, MCOs must identify and track critical incidents, regularly review the number and types of incidents and findings from investigations and develop and implement strategies to reduce the occurrence of critical incidents and improve the quality of care delivered to members. MCOs are required to follow the process outlined at 441 Iowa Administrative Code Chapter 77 for reporting major incidents. The State maintains ultimate oversight through the mechanisms identified in the submitted amendment (i.e., HCBS QIO, critical incident review, etc.)

## Appendix G: Participant Safeguards

### Appendix G-2: Safeguards Concerning Restraints and Restrictive Interventions (2 of 3)

**b. Use of Restrictive Interventions.** (*Select one*):

- ☐ The state does not permit or prohibits the use of restrictive interventions

Specify the state agency (or agencies) responsible for detecting the unauthorized use of restrictive interventions and how this oversight is conducted and its frequency:

- ☒ The use of restrictive interventions is permitted during the course of the delivery of waiver services Complete Items G-2-b-i and G-2-b-ii.

**i. Safeguards Concerning the Use of Restrictive Interventions.** Specify the safeguards that the state has in effect concerning the use of interventions that restrict participant movement, participant access to other individuals, locations or activities, restrict participant rights or employ aversive methods (not including restraints or seclusion) to modify behavior. State laws, regulations, and policies referenced in the specification are available to CMS upon request through the Medicaid agency or the operating agency.

## FFS and MCO

A restrictive intervention is an action or procedure that imposes a restriction of movement, that limits a member's movement, access to other individuals, locations or activities, or restricts a member's rights. 441-IAC 77.25(4) describes restrictive interventions as restraints, restrictions and behavioral intervention. Waiver policy regarding restrictive interventions comport with the home and community-based setting requirements at Section 42 CFR 441.301(c)(4)(iii) and (vi)(F), and person-centered service planning and plan requirements at 42 CFR 44.301(c)(1) and (c)(2).

The HHS policy regarding restrictive interventions is as follows and applies to all types of restrictions that may be used by waiver providers. A restrictive intervention is an action or procedure that limits a member's movement, access to other individuals, locations, activities, or restricts a member's rights. The use of any restrictive interventions as part of the waiver program is treated as rights limitations of the member receiving services. As a rights limitation, the restrictive interventions must be agreed to by the interdisciplinary team and identified in the member's plan of care (441 Iowa Administrative Code 83.67(4)).

Per 441 Iowa Administrative Code Chapter 77.25(4), "shall have in place a system for the review, approval, and implementation of ethical, safe, humane, and efficient behavioral intervention procedures." All members receiving home- and community-based habilitation services shall be afforded the protections imposed by these rules when any restraint, restriction, or behavioral intervention is implemented.

- a. The system shall include procedures to inform the member and the member's legal guardian of the restraint, restriction, and behavioral intervention policy and procedures at the time of service approval and as changes occur.
- b. Restraint, restriction, and behavioral intervention shall be used only for reducing or eliminating maladaptive target behaviors that are identified in the member's restraint, restriction, or behavioral intervention program.
- c. Restraint, restriction, and behavioral intervention procedures shall be designed and implemented only for the benefit of the member and shall never be used as punishment, for the convenience of the staff, or as a substitute for a nonaversive program.
- d. Restraint, restriction, and behavioral intervention programs shall be time-limited and shall be reviewed at least quarterly.
- e. Corporal punishment and verbal or physical abuse are prohibited."

These safeguards are the same regardless of what restrictions are used. All restrictions must also be consistent with the Children's Health Act of 2000 and other applicable Federal laws. All members served under an HCBS waiver service shall be afforded the protections imposed by these requirements. Any provider contracting with HHS to provide waiver services must conduct its activities in accordance with these requirements. Restrictions may be designed and implemented only for the benefit of the member and may never be used merely as punishment or for the convenience of the staff or as a substitute for a nonaversive program.

The case manager or community-based case manager has the responsibility to assess the need for the restrictive interventions, identify the specific restrictive intervention, explain why the intervention is being used, identify an intervention plan, monitor the use of the restrictive intervention, and assess and reassess need for continued use. The service plan authorizes the services to be delivered to the member and identifies how they are to be provided. Without the authorization, services cannot be provided to a member.

Providers are required to use the service plan as the basis for the development and implementation of the providers' treatment plan. The provider is responsible for developing a plan to meet the needs of the member and to train all staff on the implementation strategies of the treatment plan, such that the interventions are individualized and in accordance with the previously devised plan. Providers and the case manager or community-based case manager are responsible for documenting all behavioral interventions, including restrictive interventions, in the service plan as well as the member's response to the intervention. Providers and case manager or community-based case manager are also required to submit critical incident reports to the BLTSS, via the IMPA, any time restrictive intervention is utilized.

Providers are required to maintain a system for the review, approval and implementation of ethical, safe, humane and efficient behavioral intervention procedures, that inform the member and his/her legal guardian

of the behavioral intervention policy and procedures at the time of entry into a facility and as changes occur.

Non-aversive methods of intervention must be designed and utilized as the option of first use, prior to design or implementation of any behavioral intervention containing aversive techniques.

Behavioral intervention procedures may be designed and implemented only for the benefit of the member and may never be used merely as punishment or for the convenience of the staff or as a substitute for a nonaversive program. Behavioral intervention procedures may only be used for reducing or eliminating maladaptive target behaviors that are identified in the member's Behavioral Intervention Program. Corporal punishment and verbal or physical abuse are prohibited. Restrictions may only be used for reducing or eliminating maladaptive target behaviors that are identified in the member's Behavioral Intervention Program. For the purposes of decelerating maladaptive target behaviors a Behavioral Intervention Program includes at least the following components:

- A clear objective description of the maladaptive target behavior to be reduced or eliminated.
- A clear objective description of the incompatible or alternative appropriate response, which will be reinforced.
- A list of restrictions and behavioral interventions utilized to teach replacement behaviors that serve the same behavioral function identified through a functional analysis or review of the maladaptive target behaviors. Restrictions and behavioral interventions may only be utilized to teach replacement behaviors when non-aversive methods of positive support have been ineffective.
- A baseline measurement of the level of the target behavior before intervention.

Any provider employee who implements an aversive procedure must be able to carry out the procedure as it is written. A person's ability to implement a procedure must be documented in one of the following ways:

- A program staff person may observe each person in a role-play situation in order to document his or her ability to implement the procedure as written.
- Supervisory personnel from the provider may provide documentation of employees' ability to implement a procedure if the following conditions are met: (i) the supervisor's ability to implement the procedure has been documented by a program staff person; (ii) the supervisor observes each employee in a role play situation and documents the employee's ability to implement the procedure; and (iii) the provider maintains a list of those employees who have been observed and are considered capable of implementing the procedure. The list should specify the dates that an employee demonstrated competency and the name of staff that certified the employee.
- Implementation of a program to alter an member's behaviors.

Restrictions and behavioral intervention procedures must be implemented by systematic program review. It must ensure that a member's right to be free from aversive, intrusive procedures is balanced against the member's interests in receiving services and treatment whenever a decision regarding the use of aversive procedures is made. Any decision to implement a program to alter a member's behavior must be made by the interdisciplinary team and the program must be described fully as a Behavioral Intervention Program incorporated into the member's service plan and the case manager or community-based case manager's plan of care. In general, the Behavioral Intervention Program must meet the following minimum requirements:

- Show that previous attempts to modify the maladaptive target behavior using less restrictive procedures have not proven to be effective, or the situation is so serious that a restrictive procedure is immediately warranted.
- The proposed procedure is a reasonable response to the member's maladaptive target behavior.
- Emphasize the development of the functional alternative behavior and positive approaches and positive behavior intervention.
- Use the least restrictive intervention possible.
- Ensure the health and safety of the member and that abusive or demeaning intervention is expressly prohibited.
- Be evaluated and approved by the interdisciplinary team through quarterly reviews of specific data on the progress and effectiveness of the procedures.

Documentation regarding the Behavioral Intervention Program must include:

- Approval by the member's interdisciplinary team, with the written consent of the member's parent if the member is under eighteen years of age, or the member's legal guardian if one has been appointed by the

court.

- A written endorsement from a physician for any procedure that might affect the member's health.
- A functional analysis that is defined as, and includes, the following components:
  - (i) clear, measurable description of the behavior to include frequency, duration, intensity and severity of the behavior;
  - (ii) clear description of the need to alter the behavior; an assessment of the meaning of the behavior, which includes the possibility that the behavior is an effort to communicate, the result of medical conditions or environmental causes; or the result of other factors;
  - (iii) description of the conditions that precede the behavior in question;
  - (iv) description of what appears to reinforce and maintain the behavior; and
  - (v) a clear and measurable procedure, which will be used to alter the behavior and develop the functional alternative behavior.
- Documentation that the member, the guardian, and interdisciplinary team are fully aware of and consent to the program in accordance with the interdisciplinary process.
- Documentation of all prior programs used to eliminate a maladaptive target behavior.
- Documentation of staff training.

Behavioral Intervention Programs shall be time limited and reviewed at least quarterly. Restrictions must be considered on an individual basis after they are reviewed by the interdisciplinary team and entered into the written plan of care with specific time lines. All restrictions are explained to the member and their legal representative and agreed upon ahead of time. Unauthorized use of restrictions would be detected via interviews with the member, their family and staff and case manager or community-based case manager; through review of critical incident reports by HHS and member's case manager or community-based case manager on a daily basis; HHS and case manager or community-based case manager review of written documentation authored by provider staff; through the annual review activities associated with the provider Self-Assessment process; and by reports from any interested party (complaints).

Reviews may include desk reviews where the department requests member's records to be reviewed or onsite where the department or department designee goes onsite to review documentation. One hundred percent of waiver providers are reviewed at least once every five years to ensure that the HHS policy for each type of agency identified restriction is observed and member rights are safeguarded. If it is found that a waiver provider is not observing HHS policy or ensuring a member's rights, adverse action is taken by Iowa Medicaid, which may include sanction, termination, required corrective action, etc.

The HCBS QIO is also responsible for conducting CAHPS interviews with waiver members. The CAHPS tool has been expanded based on the federal PES tool and thought to capture a more comprehensive view of Iowa's waiver population needs and issues. The CAHPS tool incorporates the seven principles of the Quality Framework and is able to adjust based on the member interviewed and service enrollment. HCBS Specialists conduct interviews either face-to-face or via telephone, to the discretion of the waiver member. All waiver members have the right to decline interview. The results of these interviews are presented to the state on a quarterly basis.

The member's case manager or community-based case manager is responsible to monitor individual plans of care including the use of restrictions and behavioral interventions.

- ii. State Oversight Responsibility.** Specify the state agency (or agencies) responsible for monitoring and overseeing the use of restrictive interventions and how this oversight is conducted and its frequency:

The first line of responsibility for overseeing the use of restrictive interventions and ensuring safeguards are in place is the member's case manager or community-based case manager. The use of restrictive interventions must be assessed as needed and identified in the individual member's service plan. The use of restrictions would also require the development and implementation of a restrictive intervention plan and the plan would be included in the member's service plan. The member's case manager or community-based case manager is responsible for monitoring the service plan to assure that supports and services in the service plan are being implemented as identified in the service plan. Any issues with the use of restrictive interventions would be addressed with the provider of service and corrected as needed.

The State contracts with the HCBS QIO to oversee the appropriateness, provider policies and procedures, and service plan components associated with restrictions. The Unit conducts periodic reviews of 100% of enrolled waiver service providers to ensure that policies and procedures are consistent with State and federal rule, regulations, and best practices. Further, the Unit examines member files, and conducts targeted reviews based on complaints, to ascertain whether restrictions are appropriately incorporated into the service plan, such that restrictions are only implemented as designated in the plan (who, what, when, where, why, and how). If the Unit discovers that the provider is less than compliant, the provider is required to complete a corrective action plan (CAP) and implement the CAP to 100% compliance. If it is found that the circumstances are more serious, recommendations are made to PS and possible sanctions (suspension, probation, termination, etc.) may apply.

All waiver service providers, regardless if serving FFS or MCO members, are required to submit major incident reports. Categories within the incident report include inappropriate use of restrictions.

#### FFS

For FFS members, provider reports of restrictive interventions are entered into IMPA, which trigger milestones in IoWANS for fee-for-service members. These triggers alert case managers and prompt the Iowa Medicaid HCBS Incident Reporting Specialist to conduct a review of the restrictive intervention. If it is found that the restrictive intervention demands further investigation, the issue is passed to the HCBS Unit for a targeted review. If the Unit discovers that the provider is less than compliant in areas surrounding the use of restrictions, the provider is required to complete a corrective action plan (CAP) and implement the CAP to 100% compliance. If it is found that the circumstances are more serious, recommendations are made to the Iowa Medicaid Program Integrity Unit for possible sanctions that may apply.

#### MCO

For MCO members, provider reports are entered into the designated MCO critical incident reporting system. In the MCO system and processes, MCO CBCMs are alerted along with the MCO Critical Incident Reporting Specialist to conduct a review of the restrictive intervention. Processes for targeted review, provider corrective actions and PI referral, if warranted, are followed as discussed in the FFS process.

#### CAHPS INTERVIEWS

The HCBS Quality Oversight Unit is also responsible for conducting the HCBS CAHPS survey with FFS members. The HCBS Quality Oversight Unit conduct interviews either face-to-face or via telephone, to the discretion of the member. All waiver members have the right to decline interview. The results of these interviews are presented to the state on a quarterly basis. The HCBS Specialists conducting CAHPS interviews conduct individual remediation to flagged questions. In the instance that a flagged question/response occurs, the Specialist first seeks further clarification from the member and provides education when necessary. Following the interview, the case manager is notified and information regarding remediation is required within 30 days. This data is stored in a database and reported to the state on a quarterly and annual basis. MCO are responsible for research and follow up to flagged responses. General methods for problem correction at a systemic level include informational letters, provider trainings, collaboration with stakeholders and changes to provider policy

Finally, the HCBS Unit compiles all data related to incidents associated with the inappropriate use of restrictions, as well as data from periodic and targeted provider reviews. Data is analyzed to identify trends and patterns and reported on a monthly and quarterly basis to HHS. Trends are used, along with those established in the monthly State QA Committee, to guide the dissemination of Informational Letters and revisions to State Administrative Rules.

MCO Community based case managers are responsible for monitoring service plans to assure that supports and services in the service plan are being implemented as identified in the service plan. Any issues with the use of restrictive interventions would be addressed with the provider of service and corrected as needed. In addition, MCOs must identify and track critical incidents, regularly review the number and types of incidents and findings from investigations and develop and implement strategies to reduce the occurrence of critical incidents and improve the quality of care delivered to members. MCOs are required to follow the process outlined at 441 Iowa Administrative Code 77.41(12) for reporting major incidents.

The State maintains ultimate oversight through the mechanisms identified in the submitted amendment (i.e., HCBS QIO, critical incident review, etc.).

## Appendix G: Participant Safeguards

### Appendix G-2: Safeguards Concerning Restraints and Restrictive Interventions (3 of 3)

**c. Use of Seclusion.** *(Select one): (This section will be blank for waivers submitted before Appendix G-2-c was added to WMS in March 2014, and responses for seclusion will display in Appendix G-2-a combined with information on restraints.)*

☐ **The state does not permit or prohibits the use of seclusion**

Specify the state agency (or agencies) responsible for detecting the unauthorized use of seclusion and how this oversight is conducted and its frequency:

☒ **The use of seclusion is permitted during the course of the delivery of waiver services.** Complete Items G-2-c-i and G-2-c-ii.

**i. Safeguards Concerning the Use of Seclusion.** Specify the safeguards that the state has established concerning the use of each type of seclusion. State laws, regulations, and policies that are referenced are available to CMS upon request through the Medicaid agency or the operating agency (if applicable).



The HHS policy regarding seclusion is as follows, and applies to all types of seclusions that may be used by waiver providers, regardless of delivery system (i.e., FFS or MCO) Examples of seclusion include but are not limited to locking a member in a room, locking an member out of an area of their residence, or limiting community time. All incidents of seclusion must be documented in the member's service record and reported to Iowa Medicaid as a critical incident. As a rights limitation, the seclusion procedures must be agreed to by the interdisciplinary team and identified in the member's plan of care (441 Iowa Administrative Code Chapter 83). All incidents of seclusion must be documented in a member's file and reported as a critical incident. Waiver policy regarding use of seclusion comport with the home and community-based setting requirements at Section 42 CFR 441.301(c)(4)(iii) and (vi)(F), and person-centered service planning and plan requirements at 42 CFR 44.301(c)(1) and (c)(2).

Per 441 Iowa Administrative Code Chapter 77.25(4), providers "shall have in place a system for the review, approval, and implementation of ethical, safe, humane, and efficient behavioral intervention procedures." All members receiving home- and community-based habilitation services shall be afforded the protections imposed by these rules when any restraint, restriction, or behavioral intervention is implemented.

- a. The system shall include procedures to inform the member and the member's legal guardian of the restraint, restriction, and behavioral intervention policy and procedures at the time of service approval and as changes occur.
- b. Restraint, restriction, and behavioral intervention shall be used only for reducing or eliminating maladaptive target behaviors that are identified in the member's restraint, restriction, or behavioral intervention program.
- c. Restraint, restriction, and behavioral intervention procedures shall be designed and implemented only for the benefit of the member and shall never be used as punishment, for the convenience of the staff, or as a substitute for a nonaversive program.
- d. Restraint, restriction, and behavioral intervention programs shall be time-limited and shall be reviewed at least quarterly.
- e. Corporal punishment and verbal or physical abuse are prohibited."

The same standard is used for seclusion as a restrictive intervention. All seclusions must also be consistent with the Children's Health Act of 2000 and other applicable Federal laws. All members served under an HCBS waiver service shall be afforded the protections imposed by these requirements. Any provider contracting with HHS to provide waiver services must conduct its activities in accordance with these requirements. Seclusion procedures may be designed and implemented only for the benefit of the member and may never be used merely as punishment or for the convenience of the staff or as a substitute for a nonaversive program.

Seclusion may be allowed depending on the provider's agency policy to ensure that there is an accompanying behavioral intervention plan, documentation of each instance, and monitoring of its use. Seclusion can be considered on an individual basis after the interdisciplinary team reviews them, and are entered into the written plan of care with specific time lines. If a member were placed in a closed room, the time frame would need to be determined on an individual basis and spelled out in the service plan. The provider would need to document the use of this seclusion in the member's service file each time it was utilized by staff. The provider would be required to have a written policy approved by HHS on the supervision and monitoring of members placed in a closed room, such as monitoring on a fifteen minute basis to assure the health and welfare of the member.

Seclusion procedures may only be used for reducing or eliminating maladaptive target behaviors that are identified in the member's Behavioral Intervention Program. For the purposes of decelerating maladaptive target behaviors a Behavioral Intervention Program includes at least the following components:

- A clear objective description of the maladaptive target behavior to be reduced or eliminated.
  - A clear objective description of the incompatible or alternative appropriate response, which will be reinforced.
  - A list of seclusions and behavioral interventions utilized to teach replacement behaviors that serve the same behavioral function identified through a functional analysis or review of the maladaptive target behaviors.
- Seclusions and behavioral interventions may only be utilized to teach replacement behaviors when nonaversive methods of positive support have been ineffective.
- A baseline measurement of the level of the target behavior before intervention.

Any provider employee who implements an aversive procedure must be able to carry out the procedure as it is written. A person's ability to implement a procedure must be documented in one of the following ways:

- A program staff person may observe each person in a role-play situation in order to document his or her ability to implement the procedure as written.
- Supervisory personnel from the provider may provide documentation of employees' ability to implement a procedure if the following conditions are met: (i) the supervisor's ability to implement the procedure has been documented by a program staff person;
- ii) the supervisor observes each employee in a role play situation and documents the employee's ability to implement the procedure; and
- (iii) the provider maintains a list of those employees who have been observed and are considered capable of implementing the procedure. The list should specify the dates that an employee demonstrated competency and the name of staff that certified the employee.
- Implementation of a program to alter an individual's behaviors.

Seclusion and behavioral intervention procedures must be implemented by systematic program review. It must ensure that a member's right to be free from aversive, intrusive procedures is balanced against the member's interests in receiving services and treatment whenever a decision regarding the use of aversive procedures is made. Any decision to implement a program to alter an member's behavior must be made by the interdisciplinary team and the program must be described fully as a Behavioral Intervention Program incorporated into the member service plan and the case manager or community-based case manager's plan of care. In general, the Behavioral Intervention Program must meet the following minimum requirements.

- Show that previous attempts to modify the maladaptive target behavior using less restrictive procedures have not proven to be effective, or the situation is so serious that a restrictive procedure is immediately warranted.
- The proposed procedure is a reasonable response to the person's maladaptive target behavior.
- Emphasize the development of the functional alternative behavior and positive approaches and positive behavior intervention.
- Use the least restrictive intervention possible.
- Ensure the health and safety of the individual and that abusive or demeaning intervention is expressly prohibited.
- Be evaluated and approved by the interdisciplinary team through quarterly reviews of specific data on the progress and effectiveness of the procedures.

Documentation regarding the behavior program must include:

- Approval by the member's interdisciplinary team, with the written consent of the member's parent if the member is under eighteen years of age, or the member's legal guardian if one has been appointed by the court.
- A written endorsement from a physician for any procedure that might affect the member's health.
- A functional analysis that is defined as and includes the following components:
  - (i) clear, measurable description of the behavior to include frequency, duration, intensity and severity of the behavior;
  - (ii) clear description of the need to alter the behavior; an assessment of the meaning of the behavior, which includes the possibility that the behavior is an effort to communicate, the result of medical conditions or environmental causes; or the result of other factors;
  - (iii) description of the conditions that precede the behavior in question;
  - iv) description of what appears to reinforce and maintain the behavior; and
  - v) a clear and measurable procedure, which will be used to alter the behavior and develop the functional alternative behavior.
- Documentation that the member, the guardian, and interdisciplinary team are fully aware of and consent to the program in accordance with the interdisciplinary process.
- Documentation of all prior programs used to eliminate a maladaptive target behavior.
- Documentation of staff training.

Behavioral Intervention Programs shall be time limited and reviewed at least quarterly. Seclusions must be considered on an individual basis after they are reviewed by the interdisciplinary team and entered into the written plan of care with specific time lines. All seclusions are explained to the member and their legal

representative and agreed upon ahead of time.

Unauthorized use of seclusion would be detected via interviews with the member, their family and staff and case manager or community-based case manager; through review of critical incident reports by HHS and member's case manager or community-based case manager on a daily basis; HHS and case manager or community-based case manager review of written documentation authored by provider staff; through the annual review activities associated with the provider Self-Assessment process; and by reports from any interested party (complaints).

Reviews may include desk reviews where the department requests member's records to be reviewed or onsite where the department or department designee goes onsite to review documentation. One hundred percent of waiver providers are reviewed at least once every five years to ensure that the HHS policy for each type of agency identified seclusion is observed and member rights are safeguarded. If it is found that a waiver provider is not observing HHS policy or ensuring a member's rights, adverse action is taken by Iowa Medicaid, which may include sanction, termination, required corrective action, etc.

The member's case manager or community-based case manager is responsible to monitor individual plans of care including the use of seclusion and behavioral interventions.

- ii. State Oversight Responsibility.** Specify the state agency (or agencies) responsible for overseeing the use of seclusion and ensuring that state safeguards concerning their use are followed and how such oversight is conducted and its frequency:

The first line of responsibility for overseeing the use of seclusion and ensuring safeguards are in place is the member's case manager or community-based case manager. The use of seclusion must be assessed as needed and identified in the individual member's service plan. The use of seclusion would also require the development and implementation of a behavior plan and the plan would be included in the member's service plan. The case manager or community-based case manager is responsible for monitoring the service plan to assure that supports and services in the service plan are being implemented as identified in the service plan. Any issues with the use of seclusion would be addressed with the provider of service and corrected as needed.

The State contracts with the HCBS QIO to oversee the appropriateness, provider policies and procedures, and service plan components associated with seclusion. The Unit conducts periodic reviews of 100% of enrolled waiver service providers to ensure that policies and procedures are consistent with State and federal rule, regulations, and best practices. Further, the Unit examines member files, and conducts targeted reviews based on complaints, to ascertain whether seclusion is appropriately incorporated into the service plan, such that seclusion is only implemented as designated in the plan (who, what, when, where, why, and how). If the Unit discovers that the provider is less than compliant, the provider is required to complete a corrective action plan (CAP) and implement the CAP to 100% compliance. If it is found that the circumstances are more serious, recommendations are made to PS and possible sanctions (suspension, probation, termination, etc.) may apply.

All waiver service providers are required to submit major incident reports. Categories within the incident report include inappropriate use of seclusion. These reports are entered into IMPA, trigger milestones in IoWANS for fee-for-service members that alert case managers and prompt the HCBS Incident Reporting Specialist to conduct a review of the incident. If it is found that the incident demands further investigation, the issue is passed to the Unit for a targeted review. If the Unit discovers that the provider is less than compliant in areas surrounding the use of seclusion, the provider is required to complete a corrective action plan (CAP) and implement the CAP to 100% compliance. If it is found that the circumstances are more serious, recommendations are made to PS and possible sanctions (suspension, probation, termination, etc.) may apply.

The HCBS Quality Oversight Unit is also responsible for conducting the HCBS CAHPS survey with waiver participants. The HCBS Quality Oversight Unit conduct interviews either face-to-face or via telephone, to the discretion of the member. All waiver members have the right to decline interview. The results of these interviews are presented to the state on a quarterly basis. The HCBS Specialists conducting CAHPS interviews conduct individual remediation to flagged questions. In the instance that a flagged question/response occurs, the Specialist first seeks further clarification from the member and provides education when necessary. Following the interview, the case manager is notified and information regarding remediation is required within 30 days. This data is stored in a database and reported to the state on a quarterly and annual basis. MCO are responsible for research and follow up to flagged responses. General methods for problem correction at a systemic level include informational letters, provider trainings, collaboration with stakeholders and changes to provider policy

Finally, the Unit compiles all data related to incidents reported in IMPA associated with the inappropriate use of seclusion, as well as data from periodic and targeted provider reviews conducted by the Unit. Data is analyzed to identify trends and patterns and reported on a monthly and quarterly basis to HHS. Trends are used, along with those established in the monthly State QA Committee, to guide the dissemination of Informational Letters and revisions to State Administrative Rules.

## Appendix G: Participant Safeguards

### Appendix G-3: Medication Management and Administration (1 of 2)

*This Appendix must be completed when waiver services are furnished to participants who are served in licensed or unlicensed living arrangements where a provider has round-the-clock responsibility for the health and welfare of residents. The Appendix does not need to be completed when waiver participants are served exclusively in their own personal residences or in the home of a family member.*

**a. Applicability.** Select one:

- ☐ **No. This Appendix is not applicable** (*do not complete the remaining items*)
- ☒ **Yes. This Appendix applies** (*complete the remaining items*)

- **Medication Management and Follow-Up**

**i. Responsibility.** Specify the entity (or entities) that have ongoing responsibility for monitoring participant medication regimens, the methods for conducting monitoring, and the frequency of monitoring.

The case manager or community-based case manager, and any provider responsible for medication administration must monitor the documentation of medication administration to ensure adherence to the service plan and provider policies and procedure. The provider agency frequently and routinely monitors as outlined in their policies and procedures, and quality improvement plans. Provider agencies are expected to review medication administration on a daily basis to ensure health and welfare of member as well as perform quality assurance on a timeframe identified by the agency (most often monthly). The case manager or community-based case manager also monitor during the annual service plan development. MCO community-based case managers monitor the documentation of medication administration to ensure adherence to the service plan and provider policies and procedures.

Monitoring includes review of the service documentation to ensure that medications have been administered at the designated times and by designated individuals. Further monitoring occurs through the report of major incidents whenever a medication error results in physicians' treatment, mental health intervention, law enforcement intervention, death, or elopement. When a major incident has occurred, follow-up, investigation, and remediation occurs as identified in G.I.d. All medication errors resulting in a major incident report or discovered via complaint are fully investigated. If it is determined that a harmful practice has been detected, the provider agency completes a corrective action plan and may face sanctions depending on severity and negligence of the circumstance.

The Iowa Medicaid program has actively managed Medicaid pharmacy benefits through a Preferred Drug List (PDL) since 2005. A governor appointed medical assistance pharmaceutical, and therapeutics (P&T) committee was established for the purpose of developing and providing ongoing review of the PDL. The prior authorization department of Iowa Medicaid QIO utilizes the PDL to review medication management. First line responsibility lies with the prescriber who is contacted by fax or telephone regarding a prescription. Pharmacists review patient profiles for proper diagnosis, dosage strength and length of therapy.

The HHS Member Services Unit has established procedures to monitor Medicaid members' prescribing physicians and pharmacies. Analysis has established risk thresholds for these factors to mitigate possible abuse, harmful drug reactions, and to improve the outcomes of medication regimes for Medicaid members. When it is identified that members exceed the established risk thresholds, the member is placed in lock-in. Lock-in establishes one prescribing physician and one filling pharmacy for each member. The Member Services Unit also conducts statistical analysis of the use of certain drugs and usage patterns. Identification of trends for prescriptions and usage patterns of high risk or addictive medications is presented to HHS on a monthly or quarterly basis.

Second-line monitoring is conducted concerning the use of behavior modifying medications through a variety of mechanisms. First, member education is designed to ensure appropriate utilization (correcting overutilization and underutilization), at a minimum, and to improve adherence. Second, restriction programs, including policies, procedures, and criteria for establishing the need for the lock-in, may also be implemented. Finally, medication therapy management programs are developed to identify and target members who would most benefit, and include coordination between the member, the pharmacist and the prescriber using various means of communication and education.

The Drug Utilization Review (DUR) Commission is a quality assurance body, which seeks to improve the quality of pharmacy services and ensure rational, cost-effective medication therapy for Medicaid members in Iowa. The commission reviews policy issues and provides suggestions on prospective DUR criteria, prior authorization guidelines, OTC coverage, and plan design issues. The DUR system provides for the evaluation of individual member profiles by a qualified professional group of physicians and pharmacists, with expertise in the clinically appropriate prescribing of covered outpatient drugs, the clinically appropriate dispensing and monitoring of outpatient drugs, drug use review, evaluations and intervention, and medical quality assurance. Members of this group also have the knowledge, ability, and expertise to target and analyze therapeutic appropriateness, inappropriate long-term use of medication, overuse/underuse/abuse/polypharmacy, lack of generic use, drug-drug interactions, drug-disease contraindications, therapeutic duplications, therapeutic benefit issues, and cost-effective drug strengths and dosage forms. In addition, the Iowa Medicaid MSU reviews Medicaid member records to ensure that the member had a diagnosis or rational documented for each medication taken.

The Department of Inspections and Appeals (DIA) is responsible for Medicaid member's medication regimes for waiver members served in an Residential Care Facility (RCF). All medical regimes are included in the member's

record. Medications administered by the facility are recorded on a medical record by the individual who administers medication. All RCFs are licensed facilities and must meet all Department of Inspections Administrative Rules to obtain an annually renewable license. Medical records are reviewed during licensure renewal. Persons administering medication must be a licensed nurse or physician or have successfully completed a department approved medication aide course. If the provider stores, handles, prescribes, dispenses, or administers prescription or over the counter medications the provider is required to develop procedures for the storage, handling, prescribing, dispensing, or administration of medication. For controlled substances, providers must maintain DIA procedures. If the provider has a physician on staff or under contract, the physician must review and document the provider's prescribed medication regime at least annually in accordance with current medical practice. Policies and procedures must be developed in written form by the provider for the dispensing, storage, and recording of all prescription and nonprescription medications administered, monitoring medications requiring close supervision because of fluctuating physical or psychological conditions, including antihypertensive, digitalis preparations, mood-altering or psychotropic drugs, or narcotics. Policies and procedures are reviewed by the HCBS Specialists for compliance with state and federal regulations. If deficiencies are found, the provider is required to submit a corrective action, and follow-up surveys may be conducted based on the severity of the deficiency.

- ii. Methods of State Oversight and Follow-Up.** Describe: (a) the method(s) that the state uses to ensure that participant medications are managed appropriately, including: (a) the identification of potentially harmful practices (e.g., the concurrent use of contraindicated medications); (b) the method(s) for following up on potentially harmful practices; and, (c) the state agency (or agencies) that is responsible for follow-up and oversight.

Second line responsibility is utilized when issues are more complex. Occurrences of high dosage use for certain medications or prescribing drugs for an age group where the drug is not FDA indicated are sent to Iowa Medicaid for review. In some cases, edits have been placed in the computer system so the prescriber could not prescribe for age groups not indicated.

Lock-In: Trending and analysis has been conducted by the MSU and “lock-in” strategies have been implemented for individuals who have, historically, multiple prescribers and pharmacies. Identification of these individuals allows the Medicaid payment of only one prescribing physician and one pharmacy. This allows for increased monitoring of appropriate medication management and mitigates the risk associated with pharmacological abuses and negative contraindications.

Drug Utilization Review (DUR) Commission: The DUR is a second line monitoring process with oversight by HHS. The DUR system includes a process of provider intervention that promotes quality assurance of care, patient safety, provider education, cost effectiveness and positive provider relations. Letters to providers generated as a result of the professional evaluation process identify concerns about medication regimens and specific patients. At least one Iowa licensed pharmacist is available to reply in writing to questions submitted by providers regarding provider correspondence, to communicate by telephone with providers as necessary and to coordinate face-to-face interventions as determined by the DUR.

The Department of Inspections and Appeals (DIA): This DIA is responsible for oversight of licensed facilities. DIA communicates all findings to HHS and any issues identified during the RCF/ID licensure process, or critical incidents as they arise. The DIA tracks information and provides training as necessary to improve quality. This information is also shared with HHS. Both the DIA and HHS follow-up with identified RCF/IDs to assure that action steps have been made to ensure potential harmful practices do not reoccur.

HCBS Quality Assurance Unit: HHS contracts with the Unit to oversee the appropriateness, provider policies and procedures, and service plan components associated with medication management. The Unit conducts periodic reviews of 100% of enrolled waiver service providers to ensure that policies and procedures are consistent with State and federal rule, regulations, and best practices. Further, the Unit examines participant files, and conducts targeted reviews based on complaints, to ascertain whether medications are appropriately incorporated into the service plan. If the Unit discovers that the provider is less than compliant, the provider is required to complete a corrective action plan (CAP) and implement the CAP to 100% compliance. If it is found that the circumstances are more serious, recommendations are made to PS and possible sanctions (suspension, probation, termination, etc.) may apply.

With respect to MCO members, community based case managers are responsible for monitoring service plans to assure that supports and services in the service plan are being implemented as identified in the service plan. Any issues with the use of medication would be addressed with the provider of service and corrected as needed. In addition, MCOs must maintain documentation of the member’s medication management done by the MCOs clinical staff; monitor the prescribing patterns of network prescribers to improve the quality of care coordination services provided to members through strategies such as: (a) identifying medication utilization that deviates from current clinical practice guidelines; (b) identifying members whose utilization of controlled substances warrants intervention; (c) providing education, support and technical assistance to providers; and (d) monitor the prescribing patterns of psychotropic medication to children, including children in foster care. Finally, MCOs must identify and track critical incidents, regularly review the number and types of incidents and findings from investigations, and develop and implement strategies to reduce the occurrence of critical incidents and improve the quality of care delivered to members. MCOs are required to follow the process outlined at 441 Iowa Administrative Code 77.25 (3) for reporting major incidents. The State maintains ultimate oversight through the mechanisms identified in the submitted amendment (i.e., HCBS Quality Assurance and Technical Assistance Unit, critical incident review, etc.).

All waiver service providers are required to submit major incident reports. Categories within the incident report include medication errors. These reports are entered into IMPA, trigger milestones in IoWANS for fee-for-service participants that alert service workers, case managers, and prompt the HCBS Incident Reporting Specialist to conduct a review of the incident. If it is found that the incident demands further investigation, the issue is passed to the Unit for a targeted review. If the Unit discovers that the provider is less than compliant in areas surrounding medication management, the provider is required to complete a corrective action plan (CAP) and



implement the CAP to 100% compliance. If it is found that the circumstances are more serious, recommendations are made to PS and possible sanctions (suspension, probation, termination, etc.) may apply.

The Unit compiles all data related to incidents reported in IMPA associated with the inappropriate use of medication, as well as data from periodic and targeted provider reviews conducted by the Unit. Data is analyzed to identify trends and patterns and reported on a monthly and quarterly basis to HHS. Trends are used, along with those established in the monthly State QA Committee, to guide the dissemination of Informational Letters and revisions to State Administrative Rules.

## Appendix G: Participant Safeguards

### Appendix G-3: Medication Management and Administration (2 of 2)

#### c. Medication Administration by Waiver Providers

##### i. Provider Administration of Medications. *Select one:*

- ☐ **Not applicable.** *(do not complete the remaining items)*
- ☒ **Waiver providers are responsible for the administration of medications to waiver participants who cannot self-administer and/or have responsibility to oversee participant self-administration of medications.** *(complete the remaining items)*
  - **State Policy.** Summarize the state policies that apply to the administration of medications by waiver providers or waiver provider responsibilities when participants self-administer medications, including (if applicable) policies concerning medication administration by non-medical waiver provider personnel. State laws, regulations, and policies referenced in the specification are available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

Providers must have a policy and procedure for the storage, handling, prescribing, dispensing and administration of prescription medications. For Schedule II medications the procedure must demonstrate compliance with 481-63.16(135C) Drugs.

Home health agencies must follow Medicare regulations for medication dispensing. All medications shall be stored in their original containers, with the accompanying physician's or pharmacist's directions and label intact. Medications shall be stored so they are inaccessible to members for whom the medications are not prescribed and the public. Nonprescription medications shall be labeled with the member's name. In the case of medications that are administered on an ongoing, long-term basis, authorization shall be obtained for a period not to exceed the duration of the prescription."

Providers are required to have staff trained on medication administration and provide safe oversight of medication administration. The State does not require specific medication administration curriculum to be used. Providers are responsible to assure that staff has the skills needed to administer medications safely. There are no uniform requirements in the Iowa Administrative Code for the provision of medication administration or for the self-administration of medications by Medicaid members.

The Provider Self-Assessment quality improvement process requires providers to have a policy and procedure for the storage and provision of medication. This process requires a more uniform approach for the provider in the requirements for medication management. The Provider Self-Assessment review checklist used by the HCBS Specialist to review providers identifies the following minimum standards that the medication policy will identify:

- The provider's role in the management and/or administration of medications
- If staff administers medications, the policy will identify the: (1) training provided to staff prior to the administration of medications; (2) method of documenting the administration of medications; (3) storage of medications; (4) the assessment process used to determine the Medicaid member's role in the administration of medications.

The provider Self-Assessment process also requires providers to have discovery, remediation and improvement processes for medication administration. The information and results of these activities is available to HHS upon request. Currently the self-assessment process is not set forth in the Iowa Administrative Code.

Home Health agencies that provide waiver services must follow Medicare regulations for medication administration and dispensing. All medications must be stored in their original containers with the accompanying physician's or pharmacist's directions and label intact. Medications shall be stored so they are inaccessible to Medicaid members and the public. Nonprescription medications shall be labeled with the Medicaid member's name. In the case of medications that are administered on an ongoing long-term basis, authorization shall be obtained for a period not to exceed the duration of the prescription.

Provider non-medical waiver staff that administers medications must have oversight of a licensed nurse. If the medication requires, the staff is required to complete a medication management course through a community college.

The requirements for non-medical waiver providers must have in order to administer medications to Medicaid members who cannot self-administer is that the provider must have a written policy in place on what the requirements are for their staff to do this and how. If the medications are psychiatric medications the person would have to have successfully completed a medication aide class. Oversight for a staff member who administers medications that require oversight such as in the case of psychiatric medications would need to follow the requirements as spelled out through the Board of Nursing such as having oversight by a registered nurse. The HCBS Specialists through Iowa Medicaid would oversee this policy upon regular reviews of the provider.

State oversight responsibility is described in Appendix H for the monitoring methods that include identification of problems in provider performance and support follow-up remediation actions and quality improvement activities

- **Medication Error Reporting.** *Select one of the following:*
  - Ⓒ **Providers that are responsible for medication administration are required to both record and report medication errors to a state agency (or agencies).**  
*Complete the following three items:*

(a) Specify state agency (or agencies) to which errors are reported:

Providers are required to complete incidents reports for all occurrences meeting the criteria for major and minor incidents and make the incident reports and related documentation available to HHS upon request. Major incidents must be reported to the BLTSS via IMPA. Providers must ensure cooperation in providing pertinent information regarding incidents as requested by HHS.

As part of the major incident reporting process described in Appendix G-1, HHS will review and follow-up on all medication errors that lead to a member hospitalization or death. This can include the wrong dosage, the wrong medication delivered, medication delivered at the wrong time, Medicaid delivery not documented, unauthorized administration of medication, or missed dosage. Providers are required to submit all medication errors, whether major or minor, to the member's case manager or community-based case manager when they occur. The case manager or community-based case manager monitors the errors and makes changes to the member's service plan as needed to assure the health and safety of the member.

The Provider Self-Assessment quality improvement process requires providers to have a policy and procedure regarding medication administration and medication management. The Provider Self-Assessment process also requires that providers have discovery, remediation, and improvement processes for medication administration and medication errors. Specifically, providers are required to have ongoing review of medication management and administration to ensure that medications are managed and administered appropriately. Providers are also required to track and trend all medication errors to assure all medication errors are reviewed and improvements made based on review of the medication error data. The information and results of these activities is made available to HHS upon request and will be reviewed as part of the ongoing Self-Assessment process conducted by the HCBS Specialists. This will include random sampling of providers, incident specific review (complaint and IR follow up) and on-site provider review held every five years. HHS is in the process of promulgating rules to establish the Provider Self-Assessment quality improvement process in the Administrative Code.

Other professionals or family members may report medication error incidents at any time as a complaint. Suspected abuse is reported to the reporting hotline operated by the Department of Health and Human Services.

(b) Specify the types of medication errors that providers are required to *record*:

Providers must track and trend all major and minor incident reports. Per Chapter 441 Iowa Administrative Code Chapter 77 “major incidents” are defined as an occurrence involving a member that is enrolled in an HCBS waiver, targeted case management, or habilitation services, and that: (1) results in a physical injury to or by the member that requires a physician’s treatment or admission to a hospital; (2) results in the death of any person; (3) requires emergency mental health treatment for the member; (4) requires the intervention of law enforcement; (5) requires a report of child abuse pursuant to Iowa Code section 232.69 or a report of dependent adult abuse pursuant to Iowa Code section 235B.3; (6) constitutes a prescription medication error or a pattern of medication errors that leads to the outcome in paragraph “1,” “2,” or “3”; or (7) involves a member’s location being unknown by provider staff who are assigned protective oversight.

Service providers, provider staff, HHS TCM, case managers, and community-based case managers are required to submit incident reports as they are witnessed or discovered. All major incidents must be reported within 48 hours of witnessing or discovering an incident has occurred, using Iowa Medicaid’s Iowa Medicaid Portal Access (IMPA) System. Suspected abuse may be reported to the statewide abuse reporting hotline operated by HHS.

Per Chapter 441 Iowa Administrative Code Chapter 77 “minor incidents” are defined as an occurrence involving a member that is enrolled in an HCBS waiver, targeted case management, or habilitation services, and that: (1) results in the application of basic first aid; (2) results in bruising; (3) results in seizure activity; (4) results in injury to self, to others, or to property; or (5) constitutes a prescription medication error.

Providers are not required to report minor incidents to the BLTSS, and reports may be reported internally within a provider’s system, in any format designated by the provider (i.e., phone, fax, email, web-based reporting, or paper submission). When a minor incident occurs or a staff member becomes aware of a minor incident, the staff member involved must submit the completed incident report to the staff member’s supervisor within 72 hours of the incident. The completed report must be maintained in a centralized file with a notation in the participant’s file.

Providers are required to record all medication errors, both major and minor, that occur. Providers are required to track and trend all medication errors and assure all medication errors are reviewed and improvements made based on review of the medication error data. The information and results of these activities is made available to HHS upon request and will be reviewed as part of the ongoing Self-Assessment process conducted by the HCBS Specialists.

(c) Specify the types of medication errors that providers must *report* to the state:

Only major incidents of medication errors that affect the health and safety of the participant, as defined by the major incident criteria, are required to be reported to the State. All medication errors, both major and minor, are required to be reported to the member’s guardian, case manager or community-based case manager.

- ☐ **Providers responsible for medication administration are required to record medication errors but make information about medication errors available only when requested by the state.**

Specify the types of medication errors that providers are required to record:

- **State Oversight Responsibility.** Specify the state agency (or agencies) responsible for monitoring the performance of waiver providers in the administration of medications to waiver participants and how monitoring is performed and its frequency.

The BLTSS is responsible for the oversight of waiver provider's implementation of policies and procedures related to the administration of medications to waiver members. Oversight monitoring is completed by the QIO through service documentation review, CIR reviews, the provider Self-Assessment process, and monitoring of the waiver member by the member's case manager or community-based case manager.

With respect to MCO members, community-based case managers are responsible for monitoring service plans to assure that supports and services in the service plan are being implemented as identified in the service plan. Any issues with the use of medication would be addressed with the provider of service and corrected as needed. In addition, MCOs must maintain documentation of the member's medication management done by the MCOs clinical staff; monitor the prescribing patterns of network prescribers to improve the quality of care coordination services provided to members through strategies such as: (a) identifying medication utilization that deviates from current clinical practice guidelines; (b) identifying members whose utilization of controlled substances warrants intervention; (c) providing education, support and technical assistance to providers; and (d) monitor the prescribing patterns of psychotropic medication to children, including children in foster care.

Finally, MCOs must identify and track critical incidents, regularly review the number and types of incidents and findings from investigations and develop and implement strategies to reduce the occurrence of critical incidents and improve the quality of care delivered to members. MCOs are required to follow the process outlined at 441 Iowa Administrative Code Chapter 77 for reporting major incidents. The State maintains ultimate oversight through the mechanisms identified in the submitted renewal application.

All medication errors are considered either major or minor incidents, as noted in Subsection "iii.b" above. The major incidents are reported to the department and follow the incident reporting follow up protocol of the department.

HHS contracts with the HCBS QIO to oversee the appropriateness, provider policies and procedures, and service plan components associated with medication management. The Unit conducts periodic reviews of 100% of enrolled waiver service providers to ensure that policies and procedures are consistent with State and federal rule, regulations, and best practices. Further, the Unit examines member files, and conducts targeted reviews based on complaints, to ascertain whether medications are appropriately incorporated into the service plan. If the Unit discovers that the provider is less than compliant, the provider is required to complete a corrective action plan (CAP) and implement the CAP to 100% compliance. If it is found that the circumstances are more serious, recommendations are made to PS and possible sanctions (suspension, probation, termination, etc.) may apply.

All waiver service providers are required to submit major incident reports. Categories within the incident report include inappropriate medication administration. These reports are entered into IMPA, trigger milestones in IoWANS for fee-for-service members that alert case managers and prompt the HCBS Incident Reporting Specialist to conduct a review of the incident. If it is found that the incident demands further investigation, the issue is passed to the Unit for a targeted review. If the Unit discovers that the provider is less than compliant in areas surrounding medication administration, the provider is required to complete a CAP and implement the CAP to 100% compliance. Again, if it is found that the circumstances are more serious, recommendations are made to PS and possible sanctions (suspension, probation, termination, etc.) may apply.

The QIO Unit compiles all data related to incidents reported in IMPA associated with the inappropriate medication administration, as well as data from periodic and targeted provider reviews conducted by the Unit. Data is analyzed to identify trends and patterns and reported on a monthly and quarterly basis to HHS. Trends are used, along with those established in the monthly State QA Committee, to guide the dissemination of Informational Letters and revisions to State Administrative Rules.

## Appendix G: Participant Safeguards

### Quality Improvement: Health and Welfare

*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: Health and Welfare**

*The state demonstrates it has designed and implemented an effective system for assuring waiver participant health and*

welfare.

**i. Sub-Assurances:**

- a. Sub-assurance: The state demonstrates on an ongoing basis that it identifies, addresses and seeks to prevent instances of abuse, neglect, exploitation and unexplained death.**

**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:**

**HW-a1: Number and percent of IAC-defined major critical incidents requiring follow-up escalation that were investigated as required. Numerator = # IAC-defined major critical incidents requiring follow-up escalation that were investigated as required; Denominator = # of IAC-defined major critical incidents requiring follow-up escalation.**

**Data Source (Select one):**

**Critical events and incident reports**

If 'Other' is selected, specify:

**Data collected in the FFS and MCO CIR databases..**

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

		<div></div>
	<input type="checkbox"/> <b>Other</b> Specify: <div></div>	

**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):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input type="checkbox"/> <b>Other</b> Specify: <div></div>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> <b>Other</b> Specify: <div></div>

**Performance Measure:**

**HW-a3: Number and percent of member service plans that indicate the member received information on how to identify and report abuse, neglect, exploitation and unexplained deaths. Numerator: # of members service plans that indicate the members received information on how to identify and report abuse, neglect, exploitation and unexplained deaths Denominator: Total # of member service plans reviewed**

**Data Source (Select one):**

**Record reviews, off-site**

If 'Other' is selected, specify:

Responsible Party for data collection/generation	Frequency of data collection/generation (check each that applies):	Sampling Approach (check each that applies):
--	--	--

(check each that applies):		
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>	<input type="checkbox"/> <b>100% Review</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>	<input checked="" type="checkbox"/> <b>Less than 100% Review</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>	<input checked="" type="checkbox"/> <b>Representative Sample</b> Confidence Interval = <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> 95% confidence level with +/- 5% margin of error </div>
<input checked="" type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> MCO and contracted entity </div>	<input type="checkbox"/> <b>Annually</b>	<input checked="" type="checkbox"/> <b>Stratified</b> Describe Group: <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> IA.0213 AIDS/HIV (.05%)  IA.0242 ID (47%)  IA.0299 BI (6%)  IA.0345 PD (4%)  IA.0819 CMH (4%)  IA.4111 HD Waiver (9%)  IA.4155 - Elderly Waiver (30%) </div>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>	<input type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; height: 30px; margin-top: 10px;"></div>
	<input type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; height: 30px; margin-top: 10px;"></div>	

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):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input checked="" type="checkbox"/> Other Specify: <div style="border: 1px solid black; padding: 2px; width: 150px;">MCO and contracted entity</div>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 150px;"></div>

**Performance Measure:**

**HW-a2: Number and percent of Critical Incident Reports (CIRs) including alleged abuse, neglect, exploitation, or unexplained death that were followed up on as required. Numerator: # of CIRs including alleged abuse, neglect, exploitation, or unexplained death that were followed up on as required; Denominator: # of CIRs that included alleged abuse, neglect, exploitation, or unexplained death.**

**Data Source (Select one):**

**Critical events and incident reports**

If 'Other' is selected, specify:

**FFS and MCO CIR databases**

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):
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input checked="" type="checkbox"/> 100% Review
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly	<input type="checkbox"/> Less than 100% Review
<input type="checkbox"/> Sub-State Entity	<input type="checkbox"/> Quarterly	<input type="checkbox"/> Representative Sample Confidence Interval = <div style="border: 1px solid black; height: 30px; width: 100px;"></div>
<input checked="" type="checkbox"/> Other	<input type="checkbox"/> Annually	<input type="checkbox"/> Stratified

Specify:  Contracted Entity including MCO		Describe Group:  
	<input type="checkbox"/> Continuously and Ongoing	<input type="checkbox"/> Other Specify:  
	<input type="checkbox"/> Other Specify:  	

**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> ):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input type="checkbox"/> Other Specify:  	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify:  

- b. Sub-assurance:** *The state demonstrates that an incident management system is in place that effectively resolves those incidents and prevents further similar incidents to the extent possible.*

**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:****HW-b2: Number and percent of critical incidents where root cause was identified.****Numerator: Number of critical incidents where root cause was identified.****Denominator: # of Critical Incident Reports****Data Source** (Select one):**Critical events and incident reports**

If 'Other' is selected, specify:

**FFS/HCBS Unit and MCO data obtained from CIR databases.**

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

**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):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input checked="" type="checkbox"/> Other Specify: <input type="text" value="MCO and contracted entity"/>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify: <input type="text"/>

**Performance Measure:**

**HW-b1: Number and percent of unresolved critical incidents that resulted in a targeted review that were appropriately resolved. Numerator: number of unresolved critical incidents that resulted in a targeted review that were appropriately resolved; Denominator: Number of unresolved critical incidents that resulted in a targeted review**

**Data Source (Select one):**

**Critical events and incident reports**

If 'Other' is selected, specify:

**FFS/HCBS Unit and MCO data obtained from CIR databases.**

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):
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input checked="" type="checkbox"/> 100% Review
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly	<input type="checkbox"/> Less than 100% Review
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly	<input type="checkbox"/> Representative Sample Confidence Interval = <input type="text"/>

<input checked="" type="checkbox"/> <b>Other</b> Specify:  <div>Contracted Entity including MCO</div>	<input checked="" type="checkbox"/> <b>Annually</b>	<input type="checkbox"/> <b>Stratified</b> Describe Group:  <div></div>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>	<input type="checkbox"/> <b>Other</b> Specify:  <div></div>
	<input type="checkbox"/> <b>Other</b> Specify:  <div></div>	

**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> ):
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>
<input type="checkbox"/> <b>Other</b> Specify:  <div></div>	<input type="checkbox"/> <b>Annually</b>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>
	<input type="checkbox"/> <b>Other</b> Specify:  <div></div>

**Performance Measure:**

**HW-b3: Number and percent of emergency room visits that meet the definition of a CI where a CIR was submitted. Numerator: Number emergency room visits, that meet the definition of a CI, where a CIR was submitted; Denominator: Number of emergency room visits meeting the definition of CI**

**Data Source** (Select one):

**Other**

If 'Other' is selected, specify:

**MMIS submitted claims and Critical events and incident reports.**

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

**Data Aggregation and Analysis:**

<b>Responsible Party for data aggregation and analysis</b> (check each that applies):	<b>Frequency of data aggregation and analysis</b> (check each that applies):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly

Responsible Party for data aggregation and analysis (check each that applies):	Frequency of data aggregation and analysis (check each that applies):
<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>

c. *Sub-assurance: The state policies and procedures for the use or prohibition of restrictive interventions (including restraints and seclusion) are followed.*

#### 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:

**HW-c1: Number and percent of providers that met the requirements for the use of restraint, restriction, or behavioral intervention programs with restrictive procedures. Numerator: number providers that met the requirements for use of restraint, restriction, or behavioral intervention programs with restrictive procedure; Denominator: total number of reviewed providers.**

**Data Source (Select one):**

**Record reviews, on-site**

If 'Other' is selected, specify:

**Provider's policies and procedures. All certified and periodic reviews are conducted on a 5 year cycle; at the end of the cycle all providers are reviewed.**

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):
<input type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly	<input checked="" type="checkbox"/> 100% Review
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly	<input type="checkbox"/> Less than 100%

		<b>Review</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input type="checkbox"/> <b>Quarterly</b>	<input type="checkbox"/> <b>Representative Sample</b> Confidence Interval = <div></div>
<input checked="" type="checkbox"/> <b>Other</b> Specify: <div>Contracted Entity</div>	<input type="checkbox"/> <b>Annually</b>	<input type="checkbox"/> <b>Stratified</b> Describe Group: <div></div>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>	<input type="checkbox"/> <b>Other</b> Specify: <div></div>
	<input type="checkbox"/> <b>Other</b> Specify: <div></div>	

**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>
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>
<input type="checkbox"/> <b>Other</b> Specify: <div></div>	<input type="checkbox"/> <b>Annually</b>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>
	<input type="checkbox"/> <b>Other</b> Specify:



<b>Responsible Party for data aggregation and analysis</b> (check each that applies):	<b>Frequency of data aggregation and analysis</b> (check each that applies):

- d. *Sub-assurance: The state establishes overall health care standards and monitors those standards based on the responsibility of the service provider as stated in the approved waiver.*

#### 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:

**HW-d1: Number and percent of waiver members who received care from a primary care physician in the last 12 months. Numerator: Number of waiver members who received care from a primary care physician in the last 12 months; Denominator: Number of waiver members reviewed**

**Data Source** (Select one):

**Other**

If 'Other' is selected, specify:

**MMIS Claims Data**

<b>Responsible Party for data collection/generation</b> (check each that applies):	<b>Frequency of data collection/generation</b> (check each that applies):	<b>Sampling Approach</b> (check each that applies):
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>	<input type="checkbox"/> <b>100% Review</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input checked="" type="checkbox"/> <b>Monthly</b>	<input checked="" type="checkbox"/> <b>Less than 100% Review</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input type="checkbox"/> <b>Quarterly</b>	<input checked="" type="checkbox"/> <b>Representative Sample</b> Confidence Interval =  <div style="border: 1px solid black; padding: 5px; width: fit-content;">             95% confidence level with +/- 5% margin of error           </div>
<input checked="" type="checkbox"/> <b>Other</b>	<input type="checkbox"/> <b>Annually</b>	<input checked="" type="checkbox"/> <b>Stratified</b>

Specify:  <div>Contracted Entity</div>		Describe Group:  <div>IA.0299 - BI (6%) IA.0213- AIDS/HIV (.05%) IA.0242 - ID (47%) IA.0345 - PD (4%) IA.0819 - CMH (4%) IA.4111 - HD (9%) IA.4155 - Elderly (30%)</div>
	<input type="checkbox"/> Continuously and Ongoing	<input type="checkbox"/> Other Specify: <div></div>
	<input type="checkbox"/> Other Specify: <div></div>	

**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):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input type="checkbox"/> Other Specify: <div></div>	<input type="checkbox"/> Annually
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify:

Responsible Party for data aggregation and analysis (check each that applies):	Frequency of data aggregation and analysis (check each that applies):

- 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 HCBS QIO and each MCO are responsible for monitoring and analyzing data associated with the major incidents reported for members on waivers. Data is pulled from the data warehouse and from MCO reporting on a regular basis for programmatic trends, individual issues and operational concerns. Reported incidents of abuse, medication error, death, rights restrictions, and restraints are investigated further by the HCBS Incident Reporting Specialist as each report is received. The analysis of this data is presented to the state on a quarterly basis.

The HCBS QIO, and each MCO, is responsible for conducting CAHPS interviews with waiver members. The CAHPS tool has been expanded based on the federal PES tool and thought to capture a more comprehensive view of Iowa's waiver population needs and issues. The CAHPS tool incorporates the seven principles of the Quality Framework and is able to adjust based on the member interviewed and service enrollment. HCBS Specialists conduct interviews either face-to-face or via telephone, to the discretion of the waiver member. All waiver members have the right to decline interview. The results of these interviews are presented to the state on a quarterly basis.

#### 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.

The HCBS Incident Reporting Specialist and each MCO analyzes data for individual and systemic issues. Individual issues require communication with the case manager or community based case manager to document all efforts to remediate risk or concern. If these efforts are not successful, staff continues efforts to communicate with the case manager, the case manager's supervisor, and protective services when necessary. All remediation efforts of this type are documented in the monthly and quarterly reports.

The HCBS Quality Oversight Unit and MCOs are also responsible for conducting the HCBS CAHPS survey with waiver participants. The HCBS Quality Oversight Unit or MCO conduct interviews either face-to-face or via telephone, to the discretion of the member. All waiver members have the right to decline interview. The results of these interviews are presented to the state on a quarterly basis. The HCBS Specialists conducting CAHPS interviews conduct individual remediation to flagged questions. In the instance that a flagged question/response occurs, the Specialist first seeks further clarification from the member and provides education when necessary. Following the interview, the case manager is notified and information regarding remediation is required within 30 days. This data is stored in a database and reported to the state on a quarterly and annual basis. MCO are responsible for research and follow up to flagged responses. General methods for problem correction at a systemic level include informational letters, provider trainings, collaboration with stakeholders and changes to provider policy.

#### ii. Remediation Data Aggregation

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

Responsible Party (check each that applies):	Frequency of data aggregation and analysis (check each that applies):
<input checked="" type="checkbox"/> State Medicaid Agency	<input type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input checked="" type="checkbox"/> Other	<input checked="" type="checkbox"/> Annually

Responsible Party( <i>check each that applies</i> ):	Frequency of data aggregation and analysis( <i>check each that applies</i> ):
Specify:  contracted entity and MCOs	
	<input type="checkbox"/> Continuously and Ongoing
	<input type="checkbox"/> Other Specify:  

**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 health and welfare that are currently non-operational.

☒ No

☐ Yes

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

## Appendix H: Quality Improvement Strategy (1 of 3)

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Under Section 1915(c) of the Social Security Act and 42 CFR § 441.302, the approval of an HCBS waiver requires that CMS determine that the state has made satisfactory assurances concerning the protection of participant health and welfare, financial accountability and other elements of waiver operations. Renewal of an existing waiver is contingent upon review by CMS and a finding by CMS that the assurances have been met. By completing the HCBS waiver application, the state specifies how it has designed the waiver's critical processes, structures and operational features in order to meet these assurances.

- Quality improvement is a critical operational feature that an organization employs to continually determine whether it operates in accordance with the approved design of its program, meets statutory and regulatory assurances and requirements, achieves desired outcomes, and identifies opportunities for improvement.

CMS recognizes that a state's waiver quality improvement strategy may vary depending on the nature of the waiver target population, the services offered, and the waiver's relationship to other public programs, and will extend beyond regulatory requirements. However, for the purpose of this application, the state is expected to have, at the minimum, systems in place to measure and improve its own performance in meeting six specific waiver assurances and requirements.

It may be more efficient and effective for a quality improvement strategy to span multiple waivers and other long-term care services. CMS recognizes the value of this approach and will ask the state to identify other waiver programs and long-term care services that are addressed in the quality improvement strategy.

### Quality Improvement Strategy: Minimum Components

The quality improvement strategy (QIS) that will be in effect during the period of the approved waiver is described throughout the waiver in the appendices corresponding to the statutory assurances and sub-assurances. Other documents cited must be available to CMS upon request through the Medicaid agency or the operating agency (if appropriate).

In the QIS discovery and remediation sections throughout the application (located in Appendices A, B, C, D, G, and I) , a state spells out:

- The evidence based discovery activities that will be conducted for each of the six major waiver assurances; and

- The *remediation* activities followed to correct individual problems identified in the implementation of each of the assurances.

In Appendix H of the application, a state describes (1) the *system improvement* activities followed in response to aggregated, analyzed discovery and remediation information collected on each of the assurances; (2) the correspondent *roles/responsibilities* of those conducting assessing and prioritizing improving system corrections and improvements; and (3) the processes the state will follow to continuously *assess the effectiveness of the OIS* and revise it as necessary and appropriate.

If the state's QIS is not fully developed at the time the waiver application is submitted, the state may provide a work plan to fully develop its QIS, including the specific tasks the state plans to undertake during the period the waiver is in effect, the major milestones associated with these tasks, and the entity (or entities) responsible for the completion of these tasks.

When the QIS spans more than one waiver and/or other types of long-term care services under the Medicaid state plan, specify the control numbers for the other waiver programs and/or identify the other long-term services that are addressed in the QIS. In instances when the QIS spans more than one waiver, the state must be able to stratify information that is related to each approved waiver program. Unless the state has requested and received approval from CMS for the consolidation of multiple waivers for the purpose of reporting, then the state must stratify information that is related to each approved waiver program, i.e., employ a representative sample for each waiver.

## Appendix H: Quality Improvement Strategy (2 of 3)

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### H-1: Systems Improvement

#### a. System Improvements

- i. Describe the process(es) for trending, prioritizing, and implementing system improvements (i.e., design changes) prompted as a result of an analysis of discovery and remediation information.

Iowa Medicaid is the single state agency that retains administrative authority of Iowa's HCBS Waivers. Iowa remains highly committed to continually improve the quality of services for all waiver programs. Iowa Medicaid discovered over the course of submitting previous 1915(c) waiver evidence packages that previously developed performance measures were not adequately capturing the activities of Iowa Medicaid. For this reason, state staff developed new performance measures to better capture the quality processes that are already occurring or being developed.

The QIS developed by Iowa consolidates and stratifies performance data across all seven 1915(c) waivers. The HCBS waiver population will be identified based waiver enrollment at a single point in time. A 95% confidence level with a 5% error rate for the total waiver population is calculated. In an effort to ensure each waiver is represented within the sample identified for the reporting year, the specific waiver enrollment will be divided by the total waiver population to identify the percentage the specific waiver contributes to the overall waiver population during that reporting year. The significant sample will be multiplied by the percentage identified for each waiver to identify the number of surveys/reviews that need to be completed for each waiver. This process is completed for each waiver to ensure that the 95% confidence level is met and that each waiver is appropriately sampled.

A common capture date will be used to count enrollment for all waivers.

Iowa began consolidating performance data collection April 1, 2020

IA.0213 - AIDS/HIV Waiver (.05%)

IA.0242 - ID Waiver (47%)

IA.0299 - BI Waiver (6%)

IA.0345 - PD Waiver (4%)

IA.0819 - CMH Waiver (4%)

IA.4111 - HD Waiver (9%)

IA.4155 - Elderly Waiver (30%)

Based on contract oversight and performance measure implementation, Iowa Medicaid holds bi-weekly policy staff and long term care coordination meetings to discuss areas of noted concern for assessment and prioritization. This can include discussion of remediation activities at an individual level, programmatic changes, and operational changes that may need to be initiated and assigned to State or contract staff. Contracts are monitored and improvements are made through other inter-unit meetings designed to promote programmatic and operational transparency while engaging in continued collaboration and improvement. Further, a quality assurance committee meets monthly to discuss focus areas, ensuring that timely remediation and contract performance is occurring at a satisfactory level. IoWANS will only be utilized for fee-for-service members.

All contracted MCOs are accountable for improving quality outcomes and developing a Quality Management/Quality Improvement (QM/QI) program that incorporates ongoing review of all major service delivery areas. The QM/QI program must have objectives that are measurable, realistic and supported by consensus among the MCOs' medical and quality improvement staff. Through the QM/QI program, the MCOs must have ongoing comprehensive quality assessment and performance improvement activities aimed at improving the delivery of healthcare services to members. As a key component of its QM/QI program, the MCOs must develop incentive programs for both providers and members, with the ultimate goal of improving member health outcomes. Finally, MCOs must meet the requirements of 42 CFR 438 Subpart E and the standards of the credentialing body by which the MCO is credentialed in development of its QM/QI program. The State retains final authority to approve the MCOs' QM/QI program. The State has developed a reporting manual for the MCOs to utilize for many of the managed care contract reporting requirements. The managed care contract also allows for the State to request additional regular and ad hoc reports.

Iowa Medicaid supports infrastructure development that ensures choice is provided to all Medicaid members seeking services and that these services are allocated at the most appropriate level possible. This will increase efficiency as less time is spent on service/funding allocation and more time is spent on care coordination and improvement. A comprehensive system of information and referrals ensures that all individuals are allowed fully informed choices prior to facility placement.

The Medicaid Quality Utilization and Improvement Data System (MQUIDS) is a data entry and retrieval application designed to facilitate the Medical Services contractor's job functions including level of care determinations, medical service prior authorizations, documentation review and the retention of other pertinent

member data. The content is guided by the business and policy requirements of medical review. The medical services reviews frequently involve the documentation of health information on individual members that must be protected.

A comprehensive system of information and referrals has been developed to ensure that all applicants are provided fully informed choices prior to facility placement. Ongoing program integrity initiatives will assist in overall system improvements. These include improvements to provider screening at enrollment, tighter sanction rules, and more emphasis on sustaining quality practices.

## ii. System Improvement Activities

Responsible Party( <i>check each that applies</i> ):	Frequency of Monitoring and Analysis( <i>check each that applies</i> ):
<input checked="" type="checkbox"/> State Medicaid Agency	<input checked="" type="checkbox"/> Weekly
<input type="checkbox"/> Operating Agency	<input checked="" type="checkbox"/> Monthly
<input type="checkbox"/> Sub-State Entity	<input checked="" type="checkbox"/> Quarterly
<input type="checkbox"/> Quality Improvement Committee	<input checked="" type="checkbox"/> Annually
<input checked="" type="checkbox"/> Other Specify: <div>Contracted Entities (Including MCOs )</div>	<input type="checkbox"/> Other Specify: <div></div>

## b. System Design Changes

- i. Describe the process for monitoring and analyzing the effectiveness of system design changes. Include a description of the various roles and responsibilities involved in the processes for monitoring & assessing system design changes. If applicable, include the state's targeted standards for systems improvement.

Iowa Medicaid has hired a Quality Assurance Manager to oversee the data compilation and remediation activities associated with the revised performance measures. The QA Manager and State policy staff address oversight of design changes and the subsequent monitoring and analysis during the bi-weekly policy and monthly quality assurance meetings. Prior to dramatic system design changes, the State will seek the input of stakeholders and test/pilot changes that are suggested and developed. Informational letters are sent out to all relevant parties prior to implementation with contact information of key staff involved. This workflow is documented in logs and in informational letters found within the HHS computer server for future reference. Stakeholder involvement and informational letters are requested or sent out on a weekly/monthly/ongoing basis as policy engages in the continuous quality improvement cycle.

Unit managers, policy staff and the QA committee continue to meet on a regular basis (weekly or monthly) to monitor performance and work plan activities. Iowa Medicaid Management and QA committees include representatives from the contracted units within Iowa Medicaid as well as State staff. These meetings serve to present and analyze data to determine patterns, trends, concerns, and issues in service delivery of Medicaid services, including by not limited to waiver services. Based on these analyses, recommendations for changes in policy are made to the Iowa Medicaid policy staff and bureau chiefs. This information is also used to provide training, technical assistance, corrective action, and other activities. The unit managers and committees monitor training and technical assistance activities to assure consistent implementation statewide. Meeting minutes/work plans track data analysis, recommendations, and prioritizations to map the continuous evaluation and improvement of the system. Iowa Medicaid analyzes general system performance through the management of contract performance benchmarks, IoWANS reports, and Medicaid Value Management reports and then works with contractors, providers and other agencies regarding specific issues. The QA committee directs workgroups on specific activities of quality improvement and other workgroups are activated as needed.

In addition to developing QM/QI programs that include regular, ongoing assessment of services provided to Medicaid beneficiaries, MCOs must maintain a QM/QI Committee that includes medical, behavioral health, and long-term care staff, and network providers. This committee is responsible for analyzing and evaluating the result of QM/QI activities, recommending policy decisions, ensuring that providers are involved in the QM/QI program, instituting needed action, and ensuring appropriate follow-up. This committee is also responsible for reviewing and approving the MCOs' QM/QI program description, annual evaluation, and associated work plan prior to submission to HHS.

- ii. Describe the process to periodically evaluate, as appropriate, the quality improvement strategy.



Iowa Medicaid reviews the overall QIS no less than annually. Strategies are continually adapted to establish and sustain better performance through improvements in skills, processes, and products. Evaluating and sustaining progress toward system goals is an ongoing, creative process that has to involve all stakeholders in the system. Improvement requires structures, processes, and a culture that encourage input from members at all levels within the system, sophisticated and thoughtful use of data, open discussions among people with a variety of perspectives, reasonable risk-taking, and a commitment to continuous learning. The QIS is often revisited more often due to the dynamic nature of Medicaid policies and regulations, as well as the changing climate of the member and provider communities.

In accordance with 42 CFR 438 Subpart E, the State will maintain a written strategy for assessing and improving the quality of services offered by MCOs including, but not limited to, an external independent review of the quality of, timeliness of, and access to services provided to Medicaid beneficiaries. MCOs must comply with the standards established by the State and must provide all information and reporting necessary for the State to carry out its obligations for the State quality strategy. MCOs are contractually required to ensure that the results of each external independent review are available to participating health care providers, members, and potential members of the organization, except that the results may not be made available in a manner that discloses the identity of any individual patient. Further, MCOs must establish stakeholder advisory boards that advise and provide input into: (a) service delivery; (b) quality of care; (c) member rights and responsibilities; (d) resolution of grievances and appeals; (e) operational issues; (f) program monitoring and evaluation; (g) member and provider education; and (h) priority issues identified by members. In accordance with 42 CFR 438 Subpart E, the State will regularly monitor and evaluate the MCOs' compliance with the standards established in the State's quality strategy and the MCOs' QM/QI program. The State is in the process of developing specific processes and timelines to report results to agencies, waiver providers, members, families, other interested parties and the public. This will include strategies such as leveraging the Medical Assistance Advisory Council (MAAC).

The HCBS QIO Unit (QIO) completes review of HCBS enrolled providers on a three-five year cycle. During the onsite review HCBS ensures personnel are trained in:

- Abuse reporting
- Incident reporting
- Have current mandatory reporter training
- Individual member support needs
- Rights restrictions
- Provision of member medication

In addition HCBS QIO reviews the centralized incident report file, appeals and grievances, and any allegations of abuse. During the review of service documentation any incident identified in narrative which falls under the Incident description in 77.41(12), is required to have an incident report filed. The agencies tracking and trending of incident reports is also reviewed during the onsite review. Any areas the agency may be out of compliance in results in the requirement of a corrective action plan. HCBS gives the provider 30 days to submit a time limited corrective action plan which will remediate the deficiency. 45 days after the corrective action plan has been accepted HCBS follows up and requires the agency to submit evidence that the corrective action plan was put into place.

## Appendix H: Quality Improvement Strategy (3 of 3)

### H-2: Use of a Patient Experience of Care/Quality of Life Survey

a. Specify whether the state has deployed a patient experience of care or quality of life survey for its HCBS population in the last 12 months (*Select one*):

- ☐ No
- ☒ Yes (*Complete item H.2b*)

b. Specify the type of survey tool the state uses:

- ☒ HCBS CAHPS Survey :
- ☐ NCI Survey :

- ☐ NCI AD Survey :
- ☐ Other (Please provide a description of the survey tool used):

## 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 services provided through the Consumer Choices Option (CCO) the state's self-direction program.*

*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- Home Maintenance Support 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> (check each that applies):	<b>Frequency of data collection/generation</b> (check each that applies):	<b>Sampling Approach</b> (check each that applies):
<input type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>	<input checked="" type="checkbox"/> <b>100% Review</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input checked="" type="checkbox"/> <b>Monthly</b>	<input type="checkbox"/> <b>Less than 100% Review</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input type="checkbox"/> <b>Quarterly</b>	<input type="checkbox"/> <b>Representative Sample</b> Confidence Interval = <div style="border: 1px solid black; height: 20px; width: 100px; margin-top: 5px;"></div>

<input checked="" type="checkbox"/> <b>Other</b> Specify:  <div>Contracted</div>	<input type="checkbox"/> <b>Annually</b>	<input type="checkbox"/> <b>Stratified</b> Describe Group:  <div></div>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>	<input type="checkbox"/> <b>Other</b> Specify:  <div></div>
	<input type="checkbox"/> <b>Other</b> Specify:  <div></div>	

**Data Aggregation and Analysis:**

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

**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.**

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

**Data Aggregation and Analysis:**

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

<b>Responsible Party for data aggregation and analysis (check each that applies):</b>	<b>Frequency of data aggregation and analysis (check each that applies):</b>
<input type="text"/>	
	<input type="checkbox"/> <b>Continuously and Ongoing</b>
	<input type="checkbox"/> <b>Other</b> Specify: <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 (check each that applies):</b>	<b>Frequency of data collection/generation (check each that applies):</b>	<b>Sampling Approach (check each that applies):</b>
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>	<input type="checkbox"/> <b>100% Review</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input checked="" type="checkbox"/> <b>Monthly</b>	<input checked="" type="checkbox"/> <b>Less than 100% Review</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input type="checkbox"/> <b>Quarterly</b>	<input checked="" type="checkbox"/> <b>Representative Sample</b> Confidence Interval = <div style="border: 1px solid black; padding: 5px; width: fit-content;">95% confidence level with a +/- 5% margin of error</div>
<input checked="" type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; padding: 5px; width: fit-content;">Contracted Entity</div>	<input type="checkbox"/> <b>Annually</b>	<input checked="" type="checkbox"/> <b>Stratified</b> Describe Group:



		IA.0213 AIDS/HIV (.05%) IA.0242 ID (47%) IA.0299 BI (6%) IA.0345 PD (4%) IA.0819 CMH (4%) IA.4111 HD Waiver (9%) IA.4155 - Elderly Waiver (30%)
	<input type="checkbox"/> <b>Continuously and Ongoing</b>	<input checked="" type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; padding: 5px; margin-top: 10px;">           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.         </div>
	<input type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 10px;"></div>	

**Data Aggregation and Analysis:**

<b>Responsible Party for data aggregation and analysis (check each that applies):</b>	<b>Frequency of data aggregation and analysis (check each that applies):</b>
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>

<b>Responsible Party for data aggregation and analysis (check each that applies):</b>	<b>Frequency of data aggregation and analysis (check each that applies):</b>
<input type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>	<input type="checkbox"/> <b>Annually</b>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>
	<input type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>

**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 (check each that applies):</b>	<b>Frequency of data collection/generation (check each that applies):</b>	<b>Sampling Approach (check each that applies):</b>
<input type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>	<input checked="" type="checkbox"/> <b>100% Review</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>	<input type="checkbox"/> <b>Less than 100% Review</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>	<input type="checkbox"/> <b>Representative</b>

		<b>Sample Confidence Interval =</b> <input type="text"/>
<input checked="" type="checkbox"/> <b>Other</b> Specify: <input type="text" value="Contracted entity"/>	<input type="checkbox"/> <b>Annually</b>	<input type="checkbox"/> <b>Stratified</b> Describe Group: <input type="text"/>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>	<input type="checkbox"/> <b>Other</b> Specify: <input type="text"/>
	<input type="checkbox"/> <b>Other</b> Specify: <input type="text"/>	

**Data Aggregation and Analysis:**

<b>Responsible Party for data aggregation and analysis (check each that applies):</b>	<b>Frequency of data aggregation and analysis (check each that applies):</b>
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>
<input type="checkbox"/> <b>Other</b> Specify: <input type="text"/>	<input type="checkbox"/> <b>Annually</b>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>
	<input type="checkbox"/> <b>Other</b> Specify: <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> (check each that applies):	<b>Frequency of data aggregation and analysis</b> (check each that applies):
<input checked="" type="checkbox"/> <b>State Medicaid Agency</b>	<input type="checkbox"/> <b>Weekly</b>
<input type="checkbox"/> <b>Operating Agency</b>	<input type="checkbox"/> <b>Monthly</b>
<input type="checkbox"/> <b>Sub-State Entity</b>	<input checked="" type="checkbox"/> <b>Quarterly</b>
<input type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></div>	<input type="checkbox"/> <b>Annually</b>
	<input type="checkbox"/> <b>Continuously and Ongoing</b>
	<input type="checkbox"/> <b>Other</b> Specify: <div style="border: 1px solid black; height: 30px; width: 100%; margin-top: 5px;"></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***

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### ***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/csrp/fee-schedule>

The following are reimbursed by fee schedules: attendant care, counseling, nursing, home maintenance support, adult day care, home delivered meals and respite (unless detailed otherwise below).

When Adult Day Care services are provided to an individual member within their home, the unit of service is a 15-minute unit and the reimbursement rate is the Adult Day Care provider's Adult Day Care rate for the 15-minute unit of service or the provider's Specialized Respite rate not to exceed the current upper rate limit for Specialized Respite in 441 IAC 79.1(2) at the time the service is delivered, whichever applies. The total cost of Adult Day Care provided in the member's home may not exceed the current upper rate limit for Specialized Respite in 441 IAC 79.1(2) at the time the service is delivered.

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

- attendant care services are reimbursed based on the agreement of the member and the provider not to exceed the upper rate limit in IAC 441.

- 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 services and CCO rates 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, including services authorized under CCO. 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. 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**

### **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. An 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 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- Home Maintenance Support 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. 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

### 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: Attendant Care, Home Maintenance Support, Home Delivered Meals, Self-Directed Personal Care, Self-Directed Personal Care, Individual Directed Goods and Services, Self Directed Community Support and Employment, and Respite 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 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,*

## **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:*

## **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**

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

### 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

### 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**
- ☐ **Coinurance**
- ☐ **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.**

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 (4 of 5)****a. Co-Payment Requirements.****iv. Cumulative Maximum Charges.**

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 (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:

**Appendix J: Cost Neutrality Demonstration****J-1: Composite Overview and Demonstration of Cost-Neutrality Formula**

**Composite Overview.** Complete the fields in Cols. 3, 5 and 6 in the following table for each waiver year. The fields in Cols. 4, 7 and 8 are auto-calculated based on entries in Cols 3, 5, and 6. The fields in Col. 2 are auto-calculated using the Factor D data from the J-2-d Estimate of Factor D tables. Col. 2 fields will be populated ONLY when the Estimate of Factor D tables in J-2-d have been completed.

**Level(s) of Care:** Hospital, Nursing Facility

Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8
Year	Factor D	Factor D'	Total: D+D'	Factor G	Factor G'	Total: G+G'	Difference (Col 7 less Column4)
1	2773.20	17488.00	20261.20	56848.00	3574.00	60422.00	40160.80
2	2873.88	17925.00	20798.88	58269.00	3663.00	61932.00	41133.12
3	2977.92	18373.00	21350.92	59726.00	3755.00	63481.00	42130.08
4	3087.40	18833.00	21920.40	61219.00	3849.00	65068.00	43147.60

Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8
Year	Factor D	Factor D'	Total: D+D'	Factor G	Factor G'	Total: G+G'	Difference (Col 7 less Column4)
5	3198.79	19303.00	22501.79	62750.00	3945.00	66695.00	44193.21

## Appendix J: Cost Neutrality Demonstration

### J-2: Derivation of Estimates (1 of 9)

- a. Number Of Unduplicated Participants Served.** Enter the total number of unduplicated participants from Item B-3-a who will be served each year that the waiver is in operation. When the waiver serves individuals under more than one level of care, specify the number of unduplicated participants for each level of care:

**Table: J-2-a: Unduplicated Participants**

Waiver Year	Total Unduplicated Number of Participants (from Item B-3-a)	Distribution of Unduplicated Participants by Level of Care (if applicable)	
		Level of Care:	Level of Care:
		Hospital	Nursing Facility
Year 1	50	1	49
Year 2	50	1	49
Year 3	50	1	49
Year 4	50	1	49
Year 5	50	1	49

## Appendix J: Cost Neutrality Demonstration

### J-2: Derivation of Estimates (2 of 9)

- b. Average Length of Stay.** Describe the basis of the estimate of the average length of stay on the waiver by participants in item J-2-a.

The average length of stay (ALOS) is expected to remain the same throughout the five years of the waiver. The ALOS days were based on historical data supporting the AIDS/HIV waiver. The CMS 372 report data used to develop and report ALOS is from the two-year period from July 1, 2021 – June 30, 2023. This data is or will be the basis for the AIDS/HIV waiver 372 reports submitted in December 2024 and December 2025.

Unduplicated participants in the current AIDS/HIV waiver renewal are based on maximum waiver caps approved by CMS. The total unduplicated number of participants remains even over the five years of the current renewal and is set at 50 (WY5 of the most current approved application), maintaining the same count in order to satisfy the requirements of the current ARPA MOE that is in effect. Once the ARPA MOE expires the state will review the actual unduplicated count. Unduplicated counts in the active AIDS/HIV waiver were established with minimal managed care experience.

Limitation on the Number of Participants - The state does not limit the number of participants that it serves for the AIDS/HIV waiver at any point in time during a waiver year.

## Appendix J: Cost Neutrality Demonstration

### J-2: Derivation of Estimates (3 of 9)

- c. Derivation of Estimates for Each Factor.** Provide a narrative description for the derivation of the estimates of the following factors.

- i. Factor D Derivation.** The estimates of Factor D for each waiver year are located in Item J-2-d. The basis and methodology for these estimates is as follows:



*Factor D is impacted by the transition from a fee-for-service program to a managed care capitation rate program. In the prior waiver period, Factor D was adjusted due to the transition to managed care. Now with increased managed care experience, Factor D projections are derived from the estimated annual average per capita Medicaid cost for home and community-based services for individuals in the waiver program.*

*The 3 sources of data used to develop Factor D are as follows:*

- 1. 372 report data for the two-year period from July 1, 2022 – June 30, 2024 (submitted December 2024 and December 2025).*
- 2. The factor estimates are from the actuarial report 'Factor Estimate Summary for HCBS Populations' calculated on a SFY 2025 Basis. This actuarial report is provided by the State's actuary and is based on Iowa's SFY25 (July 1, 2024 - June 30, 2025) capitation rates and not actual overall waiver experience.*
- 3. CPI for All Urban Consumers (CPI-U) Index for the two-year period average projection from 10/01/24 - 09/30/26. The CPI-U impacts the level of service available to individuals enrolled in HCBS waivers including better services and more flexibility in care planning. Better services and care being favorable to waiver members is the result and the substantiation for incorporating it into the Factor D calculations.*

*The unduplicated number of participants remains even over the five years of the current renewal and is set at 50 (WY5 of the most current approved application), maintaining the same count in order to satisfy the requirements of the current ARPA MOE that is in effect. The number of users in the waiver application is based on actual experience from the states past two year's 372 data available.*

*Once the ARPA MOE expires the state will review the actual unduplicated count, number of users, and expenditures to re-evaluate the projected Factor D values in the remaining waiver years. If adjustments are needed the state will submit amendments to the waiver as necessary.*

*The number of users, average units, and average cost per unit for WY1 were based on the two-year average from the two most recent waiver years of the current AIDS/HIV waiver to be certain a reasonable level of managed care experience (managed care was implemented effective April 1, 2016) was incorporated into the trends. The referenced two-year period is from July 1, 2022 – June 30, 2024. This data is or will be the basis for the AIDS/HIV waiver 372 reports submitted in December 2024 and December 2025.*

*The calculations of Factor D (number of users and average cost per unit) for waiver year's 2 through 5 were both trended at 2.5%. This was based on the CPI for All Urban Consumers (CPI-U) Index for the two-year period average projection from 07/01/24 - 06/30/26. Average units per user over the five- year renewal have been adjusted from the last renewal based on the trending of the number of users and units.*

*The new participants are not expected to change the characteristics (risk profile) of the population. The underlying capitation rates reflect the risk profile of those qualifying for the HCBS waiver, which are reflected in Factor D and Factor D'. The increase in the waiver program reflects the managed care program's incentive to move individuals from the institutional setting to the HCBS waiver community setting.*

*There are several service categories for the AIDS/HIV waiver that have zero users and dollars reported in the waiver renewal. These are service categories that are active and available under the AIDS/HIV waiver but are anticipated to have zero activity during the five years of the waiver renewal.*

- ii. Factor D' Derivation.** *The estimates of Factor D' for each waiver year are included in Item J-1. The basis of these estimates is as follows:*

*Factor D' is impacted by the transition from a fee-for-service program to a managed care capitation rate program. In the prior waiver period, Factor D' was adjusted due to the transition to managed care. The source for the WY1 Factor D' estimate is the 'Factor Estimate Summary for HCBS Populations' actuarial report based on Iowa's SFY25 (July 1, 2024 - June 30, 2025) capitation rates and not on actual overall waiver experience. This actuarial report calculated Factor D', G, and G' values based on Iowa's SFY 2025 capitation rates for HCBS populations in total.*

*The 'Factor Estimate Summary for HCBS Populations' actuarial report was determined to be the most accurate basis for calculating the Factor D' and G' estimates. In the current estimate, Factor G' on the actuarial report and in WY1 is less than Factor D'.*

*A trend was not applied to the WY1 estimate from the SFY25 source data. The capitation rates were used by the actuary and not the State to develop the estimate. Factor D' on the actuarial summary report is \$17,488, the projection for WY1.*

*The new participants are not expected to change the characteristics (risk profile) of the population. The underlying capitation rates reflect the risk profile of those qualifying for the HCBS waiver, which are reflected in Factor D and Factor D'.*

*A 2.5% trend on the WY1 Factor D' estimate was applied for each of the remaining waiver years (2-5). The 2.5% annual increase over the five-year renewal period is trended based on a two-year average of the CPI for All Urban Consumers (CPI-U) Index for the period of 07/01/24 - 06/30/26.*

*The AIDS/HIV waiver provides services for dual eligible individuals. The estimates in the waiver renewal of Factor D' do not include costs of prescribed drugs that will be furnished to these Medicare/Medicaid dual eligibles under the provisions of Part D'.*

**iii. Factor G Derivation.** *The estimates of Factor G for each waiver year are included in Item J-1. The basis of these estimates is as follows:*

*In the prior waiver renewal period, Factor G was adjusted due to the transition to managed care. In the current waiver renewal period, Factor G is based on the estimated annual average per capita Medicaid cost for hospital and nursing facility (NF) care that would be incurred for individuals served in the waiver, were the waiver not granted. Changes in population do not impact the calculation of Factor G and/or Factor G' with increases in the waiver program reflecting the managed care program's incentive to move individuals from the institutional setting to the HCBS waiver community setting.*

*The source used to support the current Factor G estimate is the actuarial report 'Factor Estimate Summary for HCBS Populations' provided by the State's actuary. It is calculated on a SFY 2025 Basis and based on Iowa's SFY25 (July 1, 2024 - June 30, 2025) capitation rates for HCBS populations in total and not actual overall waiver experience and on institutional Medicaid costs for persons receiving institutional care.*

*Waiver year (WY) 1 Factor G estimates are based on the institutional Medicaid costs for persons receiving institutional care and not on actual overall waiver experience provided. A trend was not applied to the WY1 estimate from the SFY25 source data. The actuarial report was determined to be the most accurate basis for calculating the estimate. The Factor G estimate on the actuarial summary report and for WY1 is \$56,848.*

*Factor G waiver years 2-5 are trended off WY1 at 2.5% for each waiver year. The 2.5% annual increase of the WY 2-5 renewal period is trended based on a two-year average projection of the CPI for All Urban Consumers (CPI-U) Index for the two-year period of 07/01/24 - 06/30/26.*

**iv. Factor G' Derivation.** *The estimates of Factor G' for each waiver year are included in Item J-1. The basis of these estimates is as follows:*

*In the prior waiver renewal period, Factor G’ was adjusted due to the transition to managed care. In the current waiver renewal period, Factor G’ is based on the estimated annual average per capita Medicaid cost for all services other than those included in Factor G for individuals served in the waiver, were the waiver not granted. Changes in population do not impact the calculation of Factor G and/or Factor G’ with increases in the waiver program reflecting the managed care program’s incentive to move individuals from the institutional setting to the HCBS waiver community setting.*

*The source used to support the current Factor G' estimate is the actuarial report 'Factor Estimate Summary for HCBS Populations' provided by the State’s actuary. It is calculated on a SFY 2025 Basis and based on Iowa's SFY25 (July 1, 2024 - June 30, 2025) capitation rates for HCBS populations in total and not actual overall waiver experience and on institutional Medicaid costs for persons receiving institutional care.*

*Waiver year (WY) 1 Factor G’ estimates are based on the institutional Medicaid costs for persons receiving institutional care and not on actual overall waiver experience provided. A trend was not applied to the WY1 estimate from the SFY25 source data. The actuarial report was determined to be the most accurate basis for calculating the estimate. The Factor G’ estimate on the actuarial summary report and for WY1 is \$3,574. In the current estimate, Factor G’ on the actuarial report and in WY1 is less than Factor D’.*

*Factor G' waiver years 2-5 are trended off WY1 at 2.5% for each waiver year. The 2.5% annual increase of the WY 2-5 renewal period is trended based on a two-year average projection of the CPI for All Urban Consumers (CPI-U) Index for the two-year period of 07/01/24 - 06/30/26.*

Appendix J: Cost Neutrality Demonstration

J-2: Derivation of Estimates (4 of 9)

**Component management for waiver services.** If the service(s) below includes two or more discrete services that are reimbursed separately, or is a bundled service, each component of the service must be listed. Select “manage components” to add these components.

Waiver Services	
Adult Day Care	
Respite	
Home Health Aide	
Nursing	
Financial Management Services	
Independent Support Broker	
Attendant Care	
Counseling	
Home Delivered Meals	
Home Maintenance Support	
Individual Directed Goods and Services	
Self Directed Community Support and Employment	
Skilled Attendant Care	

Appendix J: Cost Neutrality Demonstration

J-2: Derivation of Estimates (5 of 9)

- d. Estimate of Factor D.
- ii. Concurrent section 1915(b)/section 1915(c) waivers, or other authorities utilizing capitated arrangements (i.e., 1915(a), 1932(a), Section 1937). Complete the following table for each waiver year. Enter data into the Unit, # Users, Avg. Units Per User, and Avg. Cost/Unit fields for all the Waiver Service/Component items. If applicable, check the capitation box next to that service. Select Save and Calculate to automatically calculate and populate the Component Costs and Total Costs fields. All fields in this table must be completed in order to populate the Factor D fields in the J-1

Composite Overview table.

## Waiver Year: Year 1

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
<b>Adult Day Care Total:</b>							<b>0.00</b>
Adult Day Care - Extended Day	<input checked="" type="checkbox"/>	Extended Day	0	0.00	0.01	0.00	
Adult Day Care - Full Day	<input checked="" type="checkbox"/>	Full Day	0	0.00	0.01	0.00	
Adult Day Care - Half Day	<input checked="" type="checkbox"/>	Half Day	0	0.00	0.01	0.00	
Adult Day Care - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Adult Day Care - Extended Day	<input type="checkbox"/>	Extended Day	0	0.00	0.01	0.00	
FFS Adult Day Care - Full Day	<input type="checkbox"/>	Full Day	0	0.00	0.01	0.00	
FFS Adult Day Care - Half Day	<input type="checkbox"/>	Half Day	0	0.00	0.01	0.00	
FFS Adult Day Care - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Respite Total:</b>							<b>0.00</b>
Respite - Camp	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - ICF/I/D	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Hospital or Nursing Facility/Skilled	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Basic Individual	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Group Specialized Summer Day Camp	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Group	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<p><b>GRAND TOTAL: 138660.20</b></p> <p>Total: Services included in capitation: 103210.08</p> <p>Total: Services not included in capitation: 35450.12</p> <p>Total Estimated Unduplicated Participants: 50</p> <p>Factor D (Divide total by number of participants): 2773.20</p> <p>Services included in capitation: 2064.20</p> <p>Services not included in capitation: 709.00</p> <p>Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Respite - RCF/ID	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Resident Camp-Weeklong	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Group Summer Day Camp - Group Recreational	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Group	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Teen Day Camp - 13 to 21 Years Old	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Specialized	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Child Care Center	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Specialized	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Basic Individual	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Nursing Facility	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Camp	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - ICF/I/D	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Hospital or Nursing Facility/Skilled	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Basic Individual	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Group Specialized Summer Day Camp	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	

**GRAND TOTAL: 138660.20**  
 Total: Services included in capitation: 103210.08  
 Total: Services not included in capitation: 35450.12  
 Total Estimated Unduplicated Participants: 50  
 Factor D (Divide total by number of participants): 2773.20  
 Services included in capitation: 2064.20  
 Services not included in capitation: 709.00  
 Average Length of Stay on the Waiver: 274

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
FFS Respite - HHA Group	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - RCF/ID	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Resident Camp-Weeklong	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Group Summer Day Camp - Group Recreational	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Group	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Teen Day Camp - 13 to 21 Years Old	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - HHA Specialized	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Child Care Center	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Specialized	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - HHA Basic Individual	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Nursing Facility	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Home Health Aide Total:</b>							0.00
Home Health Aide	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
FFS Home Health Aide	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
<b>Nursing Total:</b>							0.00
Nursing Care in the Home/LPN; Per Visit	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
Nursing Care in the Home/RN; Per	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
<p style="text-align: right;"><b>GRAND TOTAL: 138660.20</b></p> <p style="text-align: right;">Total: Services included in capitation: 103210.08</p> <p style="text-align: right;">Total: Services not included in capitation: 35450.12</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 2773.20</p> <p style="text-align: right;">Services included in capitation: 2064.20</p> <p style="text-align: right;">Services not included in capitation: 709.00</p> <p style="text-align: right;">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Visit							
FFS Nursing Care in the Home/LPN; Per Visit	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
FFS Nursing Care in the Home/RN; Per Visit	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
<b>Financial Management Services Total:</b>							12320.83
Financial Management Services	<input checked="" type="checkbox"/>	Month	2	3.00	219.64	1317.84	
FFS Financial Management Services	<input type="checkbox"/>	Month	2	4.67	1178.05	11002.99	
<b>Independent Support Broker Total:</b>							303.66
Independent Support Broker	<input checked="" type="checkbox"/>	Hour	2	10.50	14.46	303.66	
FFS Independent Support Broker	<input type="checkbox"/>	Hour	0	10.50	14.46	0.00	
<b>Attendant Care Total:</b>							58678.52
Attendant Care Agency - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	7	1341.53	4.86	45638.85	
FFS Attendant Care Agency - 15 Minutes	<input type="checkbox"/>	15 Minutes	2	1341.53	4.86	13039.67	
<b>Counseling Total:</b>							0.00
Counseling - Individual - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Counseling - Group - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Counseling - Individual - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Counseling - Group - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Home Delivered Meals Total:</b>							54511.75
<p style="text-align: right;"><b>GRAND TOTAL: 138660.20</b></p> <p style="text-align: right;">Total: Services included in capitation: 103210.08</p> <p style="text-align: right;">Total: Services not included in capitation: 35450.12</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 2773.20</p> <p style="text-align: right;">Services included in capitation: 2064.20</p> <p style="text-align: right;">Services not included in capitation: 709.00</p> <p style="text-align: right;">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Liquid Supplement	<input checked="" type="checkbox"/>	Meal	8	12.24	5.72	560.10	
Morning Meal	<input checked="" type="checkbox"/>	Meal	5	14.69	9.05	664.72	
Evening Meal	<input checked="" type="checkbox"/>	Meal	28	168.36	9.33	43982.37	
Noon Meal	<input checked="" type="checkbox"/>	Meal	19	13.11	9.50	2366.36	
FFS Liquid Supplement	<input type="checkbox"/>	Meal	2	12.24	5.72	140.03	
FFS Morning Meal	<input type="checkbox"/>	Meal	2	14.69	9.05	265.89	
FFS Evening Meal	<input type="checkbox"/>	Meal	4	168.36	9.33	6283.20	
FFS Noon Meal	<input type="checkbox"/>	Meal	2	13.11	9.50	249.09	
<b>Home Maintenance Support Total:</b>							4250.20
Home Maintenance Support - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	1	395.00	5.38	2125.10	
FFS Home Maintenance Support - 15 Minutes	<input type="checkbox"/>	15 Minutes	1	395.00	5.38	2125.10	
<b>Individual Directed Goods and Services Total:</b>							0.00
Individual Directed Goods and Services	<input checked="" type="checkbox"/>	Month	0	0.00	0.01	0.00	
FFS Individual Directed Goods and Services	<input type="checkbox"/>	Month	0	0.00	0.01	0.00	
<b>Self Directed Community Support and Employment Total:</b>							0.00
Self Directed Community Support and Employment	<input checked="" type="checkbox"/>	Month	0	0.00	0.01	0.00	
FFS Self Directed Community Support and	<input type="checkbox"/>	Month	0	0.00	0.01	0.00	
<p><b>GRAND TOTAL: 138660.20</b></p> <p>Total: Services included in capitation: 103210.08</p> <p>Total: Services not included in capitation: 35450.12</p> <p>Total Estimated Unduplicated Participants: 50</p> <p>Factor D (Divide total by number of participants): 2773.20</p> <p>Services included in capitation: 2064.20</p> <p>Services not included in capitation: 709.00</p> <p>Average Length of Stay on the Waiver: 274</p>							



Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Employment							
<b>Skilled Attendant Care Total:</b>							8595.24
Attendant Care Agency - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	8	147.71	5.29	6251.09	
FFS Attendant Care Agency - 15 Minutes	<input type="checkbox"/>	15 Minutes	3	147.71	5.29	2344.16	
<p align="right"><b>GRAND TOTAL: 138660.20</b></p> <p align="right">Total: Services included in capitation: 103210.08</p> <p align="right">Total: Services not included in capitation: 35450.12</p> <p align="right">Total Estimated Unduplicated Participants: 50</p> <p align="right">Factor D (Divide total by number of participants): 2773.20</p> <p align="right">Services included in capitation: 2064.20</p> <p align="right">Services not included in capitation: 709.00</p> <p align="right">Average Length of Stay on the Waiver: 274</p>							

## Appendix J: Cost Neutrality Demonstration

### J-2: Derivation of Estimates (6 of 9)

#### d. Estimate of Factor D.

**ii. Concurrent section 1915(b)/section 1915(c) waivers, or other concurrent managed care authorities utilizing capitated payment arrangements.** Complete the following table for each waiver year. Enter data into the Unit, # Users, Avg. Units Per User, and Avg. Cost/Unit fields for all the Waiver Service/Component items. If applicable, check the capitation box next to that service. Select Save and Calculate to automatically calculate and populate the Component Costs and Total Costs fields. All fields in this table must be completed in order to populate the Factor D fields in the J-1 Composite Overview table.

#### Waiver Year: Year 2

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
<b>Adult Day Care Total:</b>							0.00
Adult Day Care - Extended Day	<input checked="" type="checkbox"/>	Extended Day	0	0.00	0.01	0.00	
Adult Day Care - Full Day	<input checked="" type="checkbox"/>	Full Day	0	0.00	0.01	0.00	
Adult Day Care - Half Day	<input checked="" type="checkbox"/>	Half Day	0	0.00	0.01	0.00	
Adult Day Care - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Adult Day Care - Extended Day	<input type="checkbox"/>	Extended Day	0	0.00	0.01	0.00	
<p align="right"><b>GRAND TOTAL: 143694.05</b></p> <p align="right">Total: Services included in capitation: 107366.58</p> <p align="right">Total: Services not included in capitation: 36327.47</p> <p align="right">Total Estimated Unduplicated Participants: 50</p> <p align="right">Factor D (Divide total by number of participants): 2873.88</p> <p align="right">Services included in capitation: 2147.33</p> <p align="right">Services not included in capitation: 726.55</p> <p align="right">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
FFS Adult Day Care - Full Day	<input type="checkbox"/>	Full Day	0	0.00	0.01	0.00	
FFS Adult Day Care - Half Day	<input type="checkbox"/>	Half Day	0	0.00	0.01	0.00	
FFS Adult Day Care - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Respite Total:</b>							0.00
Respite - Camp	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - ICF/I/D	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Hospital or Nursing Facility/Skilled	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Basic Individual	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Group Specialized Summer Day Camp	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Group	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - RCF/ID	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Resident Camp-Weeklong	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Group Summer Day Camp - Group Recreational	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Group	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Teen Day Camp - 13 to 21 Years Old	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Specialized	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<p align="center"><b>GRAND TOTAL: 143694.05</b></p> <p align="center">Total: Services included in capitation: 107366.58</p> <p align="center">Total: Services not included in capitation: 36327.47</p> <p align="center">Total Estimated Unduplicated Participants: 50</p> <p align="center">Factor D (Divide total by number of participants): 2873.88</p> <p align="center">Services included in capitation: 2147.33</p> <p align="center">Services not included in capitation: 726.55</p> <p align="center">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Respite - Child Care Center	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Specialized	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Basic Individual	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Nursing Facility	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Camp	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - ICF/I/D	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Hospital or Nursing Facility/Skilled	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Basic Individual	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Group Specialized Summer Day Camp	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - HHA Group	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - RCF/ID	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Resident Camp-Weeklong	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Group Summer Day Camp - Group Recreational	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Group	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Teen Day Camp - 13 to 21 Years Old	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<p style="text-align: right;"><b>GRAND TOTAL: 143694.05</b></p> <p style="text-align: right;">Total: Services included in capitation: 107366.58</p> <p style="text-align: right;">Total: Services not included in capitation: 36327.47</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 2873.88</p> <p style="text-align: right;">Services included in capitation: 2147.33</p> <p style="text-align: right;">Services not included in capitation: 726.55</p> <p style="text-align: right;">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
FFS Respite - HHA Specialized	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Child Care Center	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Specialized	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - HHA Basic Individual	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Nursing Facility	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Home Health Aide Total:</b>							0.00
Home Health Aide	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
FFS Home Health Aide	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
<b>Nursing Total:</b>							0.00
Nursing Care in the Home/LPN; Per Visit	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
Nursing Care in the Home/RN; Per Visit	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
FFS Nursing Care in the Home/LPN; Per Visit	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
FFS Nursing Care in the Home/RN; Per Visit	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
<b>Financial Management Services Total:</b>							12628.83
Financial Management Services	<input checked="" type="checkbox"/>	Month	2	3.00	225.13	1350.78	
FFS Financial Management Services	<input type="checkbox"/>	Month	2	4.67	1207.50	11278.05	
<b>Independent Support Broker Total:</b>							311.22
Independent Support	<input checked="" type="checkbox"/>					311.22	
<p style="text-align: right;"><b>GRAND TOTAL: 143694.05</b></p> <p style="text-align: right;">Total: Services included in capitation: 107366.58</p> <p style="text-align: right;">Total: Services not included in capitation: 36327.47</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 2873.88</p> <p style="text-align: right;">Services included in capitation: 2147.33</p> <p style="text-align: right;">Services not included in capitation: 726.55</p> <p style="text-align: right;">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Broker		Hour	2	10.50	14.82		
FFS Independent Support Broker	<input type="checkbox"/>	Hour	0	10.50	14.82	0.00	
<b>Attendant Care Total:</b>							60127.37
Attendant Care Agency - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	7	1341.53	4.98	46765.74	
FFS Attendant Care Agency - 15 Minutes	<input type="checkbox"/>	15 Minutes	2	1341.53	4.98	13361.64	
<b>Counseling Total:</b>							0.00
Counseling - Individual - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Counseling - Group - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Counseling - Individual - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Counseling - Group - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Home Delivered Meals Total:</b>							57467.26
Liquid Supplement	<input checked="" type="checkbox"/>	Meal	8	12.24	5.86	573.81	
Morning Meal	<input checked="" type="checkbox"/>	Meal	5	14.69	9.28	681.62	
Evening Meal	<input checked="" type="checkbox"/>	Meal	29	168.36	9.56	46676.13	
Noon Meal	<input checked="" type="checkbox"/>	Meal	19	13.11	9.74	2426.14	
FFS Liquid Supplement	<input type="checkbox"/>	Meal	2	12.24	5.86	143.45	
FFS Morning Meal	<input type="checkbox"/>	Meal	2	14.69	9.28	272.65	
FFS Evening Meal	<input type="checkbox"/>	Meal	4	168.36	9.56	6438.09	
FFS Noon Meal	<input type="checkbox"/>	Meal	2	13.11	9.74	255.38	
<b>Home Maintenance Support Total:</b>							4352.90
<p style="text-align: right;"><b>GRAND TOTAL: 143694.05</b></p> <p style="text-align: right;">Total: Services included in capitation: 107366.58</p> <p style="text-align: right;">Total: Services not included in capitation: 36327.47</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 2873.88</p> <p style="text-align: right;">Services included in capitation: 2147.33</p> <p style="text-align: right;">Services not included in capitation: 726.55</p> <p style="text-align: right;">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Home Maintenance Support - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	1	395.00	5.51	2176.45	
FFS Home Maintenance Support - 15 Minutes	<input type="checkbox"/>	15 Minutes	1	395.00	5.51	2176.45	
<b>Individual Directed Goods and Services Total:</b>							0.00
Individual Directed Goods and Services	<input checked="" type="checkbox"/>	Month	0	0.00	0.01	0.00	
FFS Individual Directed Goods and Services	<input type="checkbox"/>	Month	0	0.00	0.01	0.00	
<b>Self Directed Community Support and Employment Total:</b>							0.00
Self Directed Community Support and Employment	<input checked="" type="checkbox"/>	Month	0	0.00	0.01	0.00	
FFS Self Directed Community Support and Employment	<input type="checkbox"/>	Month	0	0.00	0.01	0.00	
<b>Skilled Attendant Care Total:</b>							8806.47
Attendant Care Agency - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	8	147.71	5.42	6404.71	
FFS Attendant Care Agency - 15 Minutes	<input type="checkbox"/>	15 Minutes	3	147.71	5.42	2401.76	
<p style="text-align: right;"><b>GRAND TOTAL: 143694.05</b></p> <p style="text-align: right;">Total: Services included in capitation: 107366.58</p> <p style="text-align: right;">Total: Services not included in capitation: 36327.47</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 2873.88</p> <p style="text-align: right;">Services included in capitation: 2147.33</p> <p style="text-align: right;">Services not included in capitation: 726.55</p> <p style="text-align: right;">Average Length of Stay on the Waiver: 274</p>							

## Appendix J: Cost Neutrality Demonstration

### J-2: Derivation of Estimates (7 of 9)

#### d. Estimate of Factor D.

ii. **Concurrent section 1915(b)/section 1915(c) waivers, or other concurrent managed care authorities utilizing capitated payment arrangements.** Complete the following table for each waiver year. Enter data into the Unit, # Users, Avg. Units Per User, and Avg. Cost/Unit fields for all the Waiver Service/Component items. If applicable, check the capitation box next to that service. Select Save and Calculate to automatically calculate and populate the Component Costs and Total Costs fields. All fields in this table must be completed in order to populate the Factor D fields in the J-1 Composite Overview table.

## Waiver Year: Year 3

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
<b>Adult Day Care Total:</b>							<b>0.00</b>
Adult Day Care - Extended Day	<input checked="" type="checkbox"/>	Extended Day	0	0.00	0.01	0.00	
Adult Day Care - Full Day	<input checked="" type="checkbox"/>	Full Day	0	0.00	0.01	0.00	
Adult Day Care - Half Day	<input checked="" type="checkbox"/>	Half Day	0	0.00	0.01	0.00	
Adult Day Care - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Adult Day Care - Extended Day	<input type="checkbox"/>	Extended Day	0	0.00	0.01	0.00	
FFS Adult Day Care - Full Day	<input type="checkbox"/>	Full Day	0	0.00	0.01	0.00	
FFS Adult Day Care - Half Day	<input type="checkbox"/>	Half Day	0	0.00	0.01	0.00	
FFS Adult Day Care - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Respite Total:</b>							<b>0.00</b>
Respite - Camp	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - ICF/I/D	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Hospital or Nursing Facility/Skilled	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Basic Individual	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Group Specialized Summer Day Camp	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Group	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - RCF/ID	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<p align="right"><b>GRAND TOTAL: 148895.93</b></p> <p align="right">Total: Services included in capitation: 111668.83</p> <p align="right">Total: Services not included in capitation: 37227.10</p> <p align="right">Total Estimated Unduplicated Participants: 50</p> <p align="right">Factor D (Divide total by number of participants): 2977.92</p> <p align="right">Services included in capitation: 2233.38</p> <p align="right">Services not included in capitation: 744.54</p> <p align="right">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Respite - Resident Camp-Weeklong	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Group Summer Day Camp - Group Recreational	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Group	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Teen Day Camp - 13 to 21 Years Old	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Specialized	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Child Care Center	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Specialized	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Basic Individual	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Nursing Facility	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Camp	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - ICF/I/D	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Hospital or Nursing Facility/Skilled	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Basic Individual	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Group Specialized Summer Day Camp	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - HHA Group	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	

**GRAND TOTAL: 148895.93**

Total: Services included in capitation: 111668.83

Total: Services not included in capitation: 37227.10

Total Estimated Unduplicated Participants: 50

Factor D (Divide total by number of participants): 2977.92

Services included in capitation: 2233.38

Services not included in capitation: 744.54

Average Length of Stay on the Waiver: 274



Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
FFS Respite - RCF/ID	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Resident Camp-Weeklong	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Group Summer Day Camp - Group Recreational	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Group	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Teen Day Camp - 13 to 21 Years Old	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - HHA Specialized	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Child Care Center	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Specialized	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - HHA Basic Individual	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Nursing Facility	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Home Health Aide Total:</b>							0.00
Home Health Aide	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
FFS Home Health Aide	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
<b>Nursing Total:</b>							0.00
Nursing Care in the Home/LPN; Per Visit	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
Nursing Care in the Home/RN; Per Visit	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
FFS Nursing Care in the	<input type="checkbox"/>					0.00	
<p style="text-align: right;"><b>GRAND TOTAL: 148895.93</b></p> <p style="text-align: right;">Total: Services included in capitation: 111668.83</p> <p style="text-align: right;">Total: Services not included in capitation: 37227.10</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 2977.92</p> <p style="text-align: right;">Services included in capitation: 2233.38</p> <p style="text-align: right;">Services not included in capitation: 744.54</p> <p style="text-align: right;">Average Length of Stay on the Waiver: <span style="border: 1px solid black; padding: 2px;">274</span></p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Home/LPN; Per Visit		Visit	0	0.00	0.01		
FFS Nursing Care in the Home/RN; Per Visit	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
<b>Financial Management Services Total:</b>							12944.58
Financial Management Services	<input checked="" type="checkbox"/>	Month	2	3.00	230.76	1384.56	
FFS Financial Management Services	<input type="checkbox"/>	Month	2	4.67	1237.69	11560.02	
<b>Independent Support Broker Total:</b>							318.99
Independent Support Broker	<input checked="" type="checkbox"/>	Hour	2	10.50	15.19	318.99	
FFS Independent Support Broker	<input type="checkbox"/>	Hour	0	10.50	15.19	0.00	
<b>Attendant Care Total:</b>							61576.23
Attendant Care Agency - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	7	1341.53	5.10	47892.62	
FFS Attendant Care Agency - 15 Minutes	<input type="checkbox"/>	15 Minutes	2	1341.53	5.10	13683.61	
<b>Counseling Total:</b>							0.00
Counseling - Individual - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Counseling - Group - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Counseling - Individual - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Counseling - Group - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Home Delivered Meals Total:</b>							60558.68
Liquid Supplement	<input checked="" type="checkbox"/>	Meal	8	12.24	6.01	588.50	
Morning Meal	<input checked="" type="checkbox"/>					698.51	
<p style="text-align: right;"><b>GRAND TOTAL: 148895.93</b></p> <p style="text-align: right;">Total: Services included in capitation: 111668.83</p> <p style="text-align: right;">Total: Services not included in capitation: 37227.10</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 2977.92</p> <p style="text-align: right;">Services included in capitation: 2233.38</p> <p style="text-align: right;">Services not included in capitation: 744.54</p> <p style="text-align: right;">Average Length of Stay on the Waiver: <span style="border: 1px solid black; padding: 2px;">274</span></p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
		Meal	5	14.69	9.51		
Evening Meal	<input checked="" type="checkbox"/>	Meal	30	168.36	9.80	49497.84	
Noon Meal	<input checked="" type="checkbox"/>	Meal	19	13.11	9.98	2485.92	
FFS Liquid Supplement	<input type="checkbox"/>	Meal	2	12.24	6.01	147.12	
FFS Morning Meal	<input type="checkbox"/>	Meal	2	14.69	9.51	279.40	
FFS Evening Meal	<input type="checkbox"/>	Meal	4	168.36	9.80	6599.71	
FFS Noon Meal	<input type="checkbox"/>	Meal	2	13.11	9.98	261.68	
<b>Home Maintenance Support Total:</b>							4463.50
Home Maintenance Support - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	1	395.00	5.65	2231.75	
FFS Home Maintenance Support - 15 Minutes	<input type="checkbox"/>	15 Minutes	1	395.00	5.65	2231.75	
<b>Individual Directed Goods and Services Total:</b>							0.00
Individual Directed Goods and Services	<input checked="" type="checkbox"/>	Month	0	0.00	0.01	0.00	
FFS Individual Directed Goods and Services	<input type="checkbox"/>	Month	0	0.00	0.01	0.00	
<b>Self Directed Community Support and Employment Total:</b>							0.00
Self Directed Community Support and Employment	<input checked="" type="checkbox"/>	Month	0	0.00	0.01	0.00	
FFS Self Directed Community Support and Employment	<input type="checkbox"/>	Month	0	0.00	0.01	0.00	
<b>Skilled Attendant Care Total:</b>							9033.94
<p align="center"><b>GRAND TOTAL: 148895.93</b></p> <p align="center">Total: Services included in capitation: 111668.83</p> <p align="center">Total: Services not included in capitation: 37227.10</p> <p align="center">Total Estimated Unduplicated Participants: 50</p> <p align="center">Factor D (Divide total by number of participants): 2977.92</p> <p align="center">Services included in capitation: 2233.38</p> <p align="center">Services not included in capitation: 744.54</p> <p align="center">Average Length of Stay on the Waiver: <span style="border: 1px solid black; padding: 2px;">274</span></p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Attendant Care Agency - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	8	147.71	5.56	6570.14	
FFS Attendant Care Agency - 15 Minutes	<input type="checkbox"/>	15 Minutes	3	147.71	5.56	2463.80	
<p style="text-align: right;"><b>GRAND TOTAL: 148895.93</b></p> <p style="text-align: right;">Total: Services included in capitation: 111668.83</p> <p style="text-align: right;">Total: Services not included in capitation: 37227.10</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 2977.92</p> <p style="text-align: right;">Services included in capitation: 2233.38</p> <p style="text-align: right;">Services not included in capitation: 744.54</p> <p style="text-align: right;">Average Length of Stay on the Waiver: 274</p>							

## Appendix J: Cost Neutrality Demonstration

### J-2: Derivation of Estimates (8 of 9)

#### d. Estimate of Factor D.

ii. Concurrent section 1915(b)/section 1915(c) waivers, or other concurrent managed care authorities utilizing capitated payment arrangements. Complete the following table for each waiver year. Enter data into the Unit, # Users, Avg. Units Per User, and Avg. Cost/Unit fields for all the Waiver Service/Component items. If applicable, check the capitation box next to that service. Select Save and Calculate to automatically calculate and populate the Component Costs and Total Costs fields. All fields in this table must be completed in order to populate the Factor D fields in the J-1 Composite Overview table.

#### Waiver Year: Year 4

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
<b>Adult Day Care Total:</b>							0.00
Adult Day Care - Extended Day	<input checked="" type="checkbox"/>	Extended Day	0	0.00	0.01	0.00	
Adult Day Care - Full Day	<input checked="" type="checkbox"/>	Full Day	0	0.00	0.01	0.00	
Adult Day Care - Half Day	<input checked="" type="checkbox"/>	Half Day	0	0.00	0.01	0.00	
Adult Day Care - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Adult Day Care - Extended Day	<input type="checkbox"/>	Extended Day	0	0.00	0.01	0.00	
FFS Adult Day Care - Full Day	<input type="checkbox"/>	Full Day	0	0.00	0.01	0.00	
<p style="text-align: right;"><b>GRAND TOTAL: 154370.12</b></p> <p style="text-align: right;">Total: Services included in capitation: 116202.26</p> <p style="text-align: right;">Total: Services not included in capitation: 38167.85</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 3087.40</p> <p style="text-align: right;">Services included in capitation: 2324.05</p> <p style="text-align: right;">Services not included in capitation: 763.36</p> <p style="text-align: right;">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
FFS Adult Day Care - Half Day	<input type="checkbox"/>	Half Day	0	0.00	0.01	0.00	
FFS Adult Day Care - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Respite Total:</b>							0.00
Respite - Camp	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - ICF/I/D	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Hospital or Nursing Facility/Skilled	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Basic Individual	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Group Specialized Summer Day Camp	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Group	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - RCF/ID	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Resident Camp-Weeklong	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Group Summer Day Camp - Group Recreational	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Group	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Teen Day Camp - 13 to 21 Years Old	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Specialized	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Child Care Center	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<p align="right"><b>GRAND TOTAL: 154370.12</b></p> <p align="right">Total: Services included in capitation: 116202.26</p> <p align="right">Total: Services not included in capitation: 38167.85</p> <p align="right">Total Estimated Unduplicated Participants: 50</p> <p align="right">Factor D (Divide total by number of participants): 3087.40</p> <p align="right">Services included in capitation: 2324.05</p> <p align="right">Services not included in capitation: 763.36</p> <p align="right">Average Length of Stay on the Waiver: <span style="border: 1px solid black; padding: 2px;">274</span></p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Respite - Home Care Agency & Non-Facility, Specialized	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Basic Individual	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Nursing Facility	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Camp	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - ICF/I/D	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Hospital or Nursing Facility/Skilled	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Basic Individual	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Group Specialized Summer Day Camp	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - HHA Group	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - RCF/ID	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Resident Camp-Weeklong	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Group Summer Day Camp - Group Recreational	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Group	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Teen Day Camp - 13 to 21 Years Old	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - HHA Specialized	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<p style="text-align: right;"><b>GRAND TOTAL: 154370.12</b></p> <p style="text-align: right;">Total: Services included in capitation: 116202.26</p> <p style="text-align: right;">Total: Services not included in capitation: 38167.85</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 3087.40</p> <p style="text-align: right;">Services included in capitation: 2324.05</p> <p style="text-align: right;">Services not included in capitation: 763.36</p> <p style="text-align: right;">Average Length of Stay on the Waiver: <span style="border: 1px solid black; padding: 2px;">274</span></p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
FFS Respite - Child Care Center	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Specialized	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - HHA Basic Individual	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Nursing Facility	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Home Health Aide Total:</b>							0.00
Home Health Aide	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
FFS Home Health Aide	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
<b>Nursing Total:</b>							0.00
Nursing Care in the Home/LPN; Per Visit	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
Nursing Care in the Home/RN; Per Visit	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
FFS Nursing Care in the Home/LPN; Per Visit	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
FFS Nursing Care in the Home/RN; Per Visit	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
<b>Financial Management Services Total:</b>							13268.18
Financial Management Services	<input checked="" type="checkbox"/>	Month	2	3.00	236.53	1419.18	
FFS Financial Management Services	<input type="checkbox"/>	Month	2	4.67	1268.63	11849.00	
<b>Independent Support Broker Total:</b>							326.97
Independent Support Broker	<input checked="" type="checkbox"/>	Hour	2	10.50	15.57	326.97	
FFS Independent	<input type="checkbox"/>					0.00	
<p style="text-align: right;"><b>GRAND TOTAL:</b> 154370.12</p> <p style="text-align: right;">Total: Services included in capitation: 116202.26</p> <p style="text-align: right;">Total: Services not included in capitation: 38167.85</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 3087.40</p> <p style="text-align: right;">Services included in capitation: 2324.05</p> <p style="text-align: right;">Services not included in capitation: 763.36</p> <p style="text-align: right;">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Support Broker		Hour	0	10.50	15.57		
<b>Attendant Care Total:</b>							63145.82
Attendant Care Agency - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	7	1341.53	5.23	49113.41	
FFS Attendant Care Agency - 15 Minutes	<input type="checkbox"/>	15 Minutes	2	1341.53	5.23	14032.40	
<b>Counseling Total:</b>							0.00
Counseling - Individual - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Counseling - Group - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Counseling - Individual - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Counseling - Group - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Home Delivered Meals Total:</b>							63793.63
Liquid Supplement	<input checked="" type="checkbox"/>	Meal	8	12.24	6.16	603.19	
Morning Meal	<input checked="" type="checkbox"/>	Meal	5	14.69	9.75	716.14	
Evening Meal	<input checked="" type="checkbox"/>	Meal	31	168.36	10.05	52452.56	
Noon Meal	<input checked="" type="checkbox"/>	Meal	19	13.11	10.23	2548.19	
FFS Liquid Supplement	<input type="checkbox"/>	Meal	2	12.24	6.16	150.80	
FFS Morning Meal	<input type="checkbox"/>	Meal	2	14.69	9.75	286.46	
FFS Evening Meal	<input type="checkbox"/>	Meal	4	168.36	10.05	6768.07	
FFS Noon Meal	<input type="checkbox"/>	Meal	2	13.11	10.23	268.23	
<b>Home Maintenance Support Total:</b>							4574.10
Home Maintenance Support - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	1	395.00	5.79	2287.05	
<p style="text-align: right;"><b>GRAND TOTAL: 154370.12</b></p> <p style="text-align: right;">Total: Services included in capitation: 116202.26</p> <p style="text-align: right;">Total: Services not included in capitation: 38167.85</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 3087.40</p> <p style="text-align: right;">Services included in capitation: 2324.05</p> <p style="text-align: right;">Services not included in capitation: 763.36</p> <p style="text-align: right;">Average Length of Stay on the Waiver: <span style="border: 1px solid black; padding: 2px;">274</span></p>							



Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
FFS Home Maintenance Support - 15 Minutes	<input type="checkbox"/>	15 Minutes	1	395.00	5.79	2287.05	
<b>Individual Directed Goods and Services Total:</b>							0.00
Individual Directed Goods and Services	<input checked="" type="checkbox"/>	Month	0	0.00	0.01	0.00	
FFS Individual Directed Goods and Services	<input type="checkbox"/>	Month	0	0.00	0.01	0.00	
<b>Self Directed Community Support and Employment Total:</b>							0.00
Self Directed Community Support and Employment	<input checked="" type="checkbox"/>	Month	0	0.00	0.01	0.00	
FFS Self Directed Community Support and Employment	<input type="checkbox"/>	Month	0	0.00	0.01	0.00	
<b>Skilled Attendant Care Total:</b>							9261.42
Attendant Care Agency - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	8	147.71	5.70	6735.58	
FFS Attendant Care Agency - 15 Minutes	<input type="checkbox"/>	15 Minutes	3	147.71	5.70	2525.84	
<p style="text-align: right;"><b>GRAND TOTAL: 154370.12</b></p> <p style="text-align: right;">Total: Services included in capitation: 116202.26</p> <p style="text-align: right;">Total: Services not included in capitation: 38167.85</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 3087.40</p> <p style="text-align: right;">Services included in capitation: 2324.05</p> <p style="text-align: right;">Services not included in capitation: 763.36</p> <p style="text-align: right;">Average Length of Stay on the Waiver: <span style="border: 1px solid black; padding: 2px;">274</span></p>							

## Appendix J: Cost Neutrality Demonstration

### J-2: Derivation of Estimates (9 of 9)

#### d. Estimate of Factor D.

**ii. Concurrent section 1915(b)/section 1915(c) waivers, or other concurrent managed care authorities utilizing capitated payment arrangements.** Complete the following table for each waiver year. Enter data into the Unit, # Users, Avg. Units Per User, and Avg. Cost/Unit fields for all the Waiver Service/Component items. If applicable, check the capitation box next to that service. Select Save and Calculate to automatically calculate and populate the Component Costs and Total Costs fields. All fields in this table must be completed in order to populate the Factor D fields in the J-1 Composite Overview table.

**Waiver Year: Year 5**

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
<b>Adult Day Care Total:</b>							<b>0.00</b>
Adult Day Care - Extended Day	<input checked="" type="checkbox"/>	Extended Day	0	0.00	0.01	0.00	
Adult Day Care - Full Day	<input checked="" type="checkbox"/>	Full Day	0	0.00	0.01	0.00	
Adult Day Care - Half Day	<input checked="" type="checkbox"/>	Half Day	0	0.00	0.01	0.00	
Adult Day Care - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Adult Day Care - Extended Day	<input type="checkbox"/>	Extended Day	0	0.00	0.01	0.00	
FFS Adult Day Care - Full Day	<input type="checkbox"/>	Full Day	0	0.00	0.01	0.00	
FFS Adult Day Care - Half Day	<input type="checkbox"/>	Half Day	0	0.00	0.01	0.00	
FFS Adult Day Care - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Respite Total:</b>							<b>0.00</b>
Respite - Camp	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - ICF/I/D	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Hospital or Nursing Facility/Skilled	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Basic Individual	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Group Specialized Summer Day Camp	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Group	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - RCF/ID	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Resident Camp-	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<p align="right"><b>GRAND TOTAL: 159939.57</b></p> <p align="right">Total: Services included in capitation: 120823.42</p> <p align="right">Total: Services not included in capitation: 39116.15</p> <p align="right">Total Estimated Unduplicated Participants: 50</p> <p align="right">Factor D (Divide total by number of participants): 3198.79</p> <p align="right">Services included in capitation: 2416.47</p> <p align="right">Services not included in capitation: 782.32</p> <p align="right">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Weeklong							
Respite - Group Summer Day Camp - Group Recreational	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Group	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Teen Day Camp - 13 to 21 Years Old	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Specialized	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Child Care Center	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Home Care Agency & Non-Facility, Specialized	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - HHA Basic Individual	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Respite - Nursing Facility	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Camp	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - ICF/I/D	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Hospital or Nursing Facility/Skilled	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Basic Individual	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Group Specialized Summer Day Camp	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - HHA Group	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - RCF/ID	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<p style="text-align: right;">GRAND TOTAL: 159939.57</p> <p style="text-align: right;">Total: Services included in capitation: 120823.42</p> <p style="text-align: right;">Total: Services not included in capitation: 39116.15</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 3198.79</p> <p style="text-align: right;">Services included in capitation: 2416.47</p> <p style="text-align: right;">Services not included in capitation: 782.32</p> <p style="text-align: right;">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
FFS Respite - Resident Camp- Weeklong	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Group Summer Day Camp - Group Recreational	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Group	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Teen Day Camp - 13 to 21 Years Old	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - HHA Specialized	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Child Care Center	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Home Care Agency & Non-Facility, Specialized	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - HHA Basic Individual	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Respite - Nursing Facility	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Home Health Aide Total:</b>							0.00
Home Health Aide	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
FFS Home Health Aide	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
<b>Nursing Total:</b>							0.00
Nursing Care in the Home/LPN; Per Visit	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
Nursing Care in the Home/RN; Per Visit	<input checked="" type="checkbox"/>	Visit	0	0.00	0.01	0.00	
FFS Nursing Care in the Home/LPN; Per Visit	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
<p style="text-align: right;">GRAND TOTAL: 159939.57</p> <p style="text-align: right;">Total: Services included in capitation: 120823.42</p> <p style="text-align: right;">Total: Services not included in capitation: 39116.15</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 3198.79</p> <p style="text-align: right;">Services included in capitation: 2416.47</p> <p style="text-align: right;">Services not included in capitation: 782.32</p> <p style="text-align: right;">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
FFS Nursing Care in the Home/RN; Per Visit	<input type="checkbox"/>	Visit	0	0.00	0.01	0.00	
<b>Financial Management Services Total:</b>							13599.91
Financial Management Services	<input checked="" type="checkbox"/>	Month	2	3.00	242.44	1454.64	
FFS Financial Management Services	<input type="checkbox"/>	Month	2	4.67	1300.35	12145.27	
<b>Independent Support Broker Total:</b>							335.16
Independent Support Broker	<input checked="" type="checkbox"/>	Hour	2	10.50	15.96	335.16	
FFS Independent Support Broker	<input type="checkbox"/>	Hour	0	10.50	15.96	0.00	
<b>Attendant Care Total:</b>							64715.41
Attendant Care Agency - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	7	1341.53	5.36	50334.21	
FFS Attendant Care Agency - 15 Minutes	<input type="checkbox"/>	15 Minutes	2	1341.53	5.36	14381.20	
<b>Counseling Total:</b>							0.00
Counseling - Individual - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
Counseling - Group - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Counseling - Individual - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
FFS Counseling - Group - 15 Minutes	<input type="checkbox"/>	15 Minutes	0	0.00	0.01	0.00	
<b>Home Delivered Meals Total:</b>							67115.51
Liquid Supplement	<input checked="" type="checkbox"/>	Meal	8	12.24	6.31	617.88	
Morning Meal	<input checked="" type="checkbox"/>	Meal	5	14.69	9.99	733.77	
Evening Meal	<input checked="" type="checkbox"/>					55491.46	
<p align="center"><b>GRAND TOTAL: 159939.57</b></p> <p align="center">Total: Services included in capitation: 120823.42</p> <p align="center">Total: Services not included in capitation: 39116.15</p> <p align="center">Total Estimated Unduplicated Participants: 50</p> <p align="center">Factor D (Divide total by number of participants): 3198.79</p> <p align="center">Services included in capitation: 2416.47</p> <p align="center">Services not included in capitation: 782.32</p> <p align="center">Average Length of Stay on the Waiver: 274</p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
		Meal	32	168.36	10.30		
Noon Meal	<input checked="" type="checkbox"/>	Meal	19	13.11	10.49	2612.95	
FFS Liquid Supplement	<input type="checkbox"/>	Meal	2	12.24	6.31	154.47	
FFS Morning Meal	<input type="checkbox"/>	Meal	2	14.69	9.99	293.51	
FFS Evening Meal	<input type="checkbox"/>	Meal	4	168.36	10.30	6936.43	
FFS Noon Meal	<input type="checkbox"/>	Meal	2	13.11	10.49	275.05	
<b>Home Maintenance Support Total:</b>							4684.70
Home Maintenance Support - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	1	395.00	5.93	2342.35	
FFS Home Maintenance Support - 15 Minutes	<input type="checkbox"/>	15 Minutes	1	395.00	5.93	2342.35	
<b>Individual Directed Goods and Services Total:</b>							0.00
Individual Directed Goods and Services	<input checked="" type="checkbox"/>	Month	0	0.00	0.01	0.00	
FFS Individual Directed Goods and Services	<input type="checkbox"/>	Month	0	0.00	0.01	0.00	
<b>Self Directed Community Support and Employment Total:</b>							0.00
Self Directed Community Support and Employment	<input checked="" type="checkbox"/>	Month	0	0.00	0.01	0.00	
FFS Self Directed Community Support and Employment	<input type="checkbox"/>	Month	0	0.00	0.01	0.00	
<b>Skilled Attendant Care Total:</b>							9488.89
Attendant Care Agency - 15 Minutes	<input checked="" type="checkbox"/>	15 Minutes	8	147.71	5.84	6901.01	
<p align="right"><b>GRAND TOTAL: 159939.57</b></p> <p align="right">Total: Services included in capitation: 120823.42</p> <p align="right">Total: Services not included in capitation: 39116.15</p> <p align="right">Total Estimated Unduplicated Participants: 50</p> <p align="right">Factor D (Divide total by number of participants): 3198.79</p> <p align="right">Services included in capitation: 2416.47</p> <p align="right">Services not included in capitation: 782.32</p> <p align="right">Average Length of Stay on the Waiver: <span style="border: 1px solid black; padding: 2px;">274</span></p>							

Waiver Service/ Component	Capitation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
FFS Attendant Care Agency - 15 Minutes	<input type="checkbox"/>	15 Minutes	3	147.71	5.84	2587.88	
<p style="text-align: right;"><b>GRAND TOTAL: 159939.57</b></p> <p style="text-align: right;">Total: Services included in capitation: 120823.42</p> <p style="text-align: right;">Total: Services not included in capitation: 39116.15</p> <p style="text-align: right;">Total Estimated Unduplicated Participants: 50</p> <p style="text-align: right;">Factor D (Divide total by number of participants): 3198.79</p> <p style="text-align: right;">Services included in capitation: 2416.47</p> <p style="text-align: right;">Services not included in capitation: 782.32</p> <p style="text-align: right;">Average Length of Stay on the Waiver: 274</p>							