

## RI CFCM Implementation

### Stakeholder Feedback Received Related to the State's Stakeholder Presentation on September 28, 2023

**\*Date Last Updated: October 10, 2023**

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*The table below is sorted by stakeholder theme and the submitting party name.*

Ref. #	Stakeholder Theme	Submitting Party Name	Stakeholder Affiliation	Question(s)/Comment(s)	RI EOHHS Response
1	CFCM Caseload	Nicholas Oliver	RI Partnership for Homecare	Is there a target number or a maximum number of CFCM entities in which EOHHS will contract?	No.
2	CFCM Caseload	Sarah Lopatka	West Bay from a compiled list from WBCAP, EBCAP, TriCAP, Child and Family	What would the case load amount be per agency? Is it still similar to what was proposed in the strategic plan?	RI EOHHS does not have a mandated caseload ratio; however, case management entities must ensure that case managers have a reasonable caseload that allows them adequate time to meet the needs of their participants and to comply with EOHHS rules, regulations, and standards.
3	CFCM Rate	Annette Bourbonniere	Unknown	Will EOHHS advocate in the legislature for financial support of CFCM on an ongoing basis or will the original financial structure remain?	This is a multi layered question as EOHHS understands the need for rate adjustments as the economy changes and rate increases are required to meet inflation and other costs. However, EOHHS will always look at rates and ensure they are appropriate. EOHHS will continue to work on CFCM rates that are in alignment with the governor and General Assembly.
4	CFCM Rate	Heather Braga	Unknown	Are there any updates to the financial structure of CFCM? Is it going to be a flat fee per client per month or a billing per unit scenario? If so, what is the per unit rate?	RI EOHHS will use a rate of \$170.87 per member per month. This is in the original strategic plan and was approved by the General Assembly and the FY24 budget. It is a per member per month. There are criteria that need to be met, in terms of contact with the member, to be able to bill for that monthly rate.
5	CFCM Rate	Noah Chevalier	State Staff	Is there a particular reason that the \$170 per member per month rate is being used while legislation is being discussed to increase the hourly Medicaid reimbursement rate?	RI EOHHS will use a monthly rate of \$170.87 per participant. This is the rate that was approved for fiscal year (FY) 2024. Anything discussed under current rate reviews will go into effect in FY 2025 at the earliest, which would start in July. Any adjustments that would come out of a reimbursement rate review would have to go through the General Assembly process and come out in FY25 if anything were to change.
6	CFCM Rate	Noah Chevalier	State Staff	Regarding the reimbursement rate, how was the rate determined regarding monthly vs. hourly rates/ fee per service?	This is detailed in the CFCM strategic plan.
7	CFCM Rate	Noah Chevalier	State Staff	In previous meetings, it was explained that Neighborhood Integrity would not be subject to these standards even though there could be conflict between them providing insurance, case management, and other services. They receive a significantly higher reimbursement rate than \$170 per member per month. Can you explain a little more about the distinction between them and other CFCM entities?	There is not a conflict because the MCOs are inherently conflict-free. Anyone in Neighborhood Integrity will not see any changes until 2025. MCOs can contract with a CFCM entity if they choose however their funding arrangement is between the MCO and the CFCM entity.
8	CFCM Rate	Paul Salera	Unknown	Are there any updates to the suggested new rate for CFCM?	RI EOHHS will use a monthly rate of \$170.87 per participant with the criteria outlined in the CFCM strategic plan.
9	CFCM Rate	Robert Archer	Child and Family of RI	From a budgeting perspective, will the new rate and billing process be implemented in the spring?	The new code will be active April 1, 2024.
10	CFCM Service Requirements	Noah Chevalier	State Staff	Is there already an entity within EOHHS that will be processing/ reviewing the CFCM Entity applications or will a new department/ position be created?	EOHHS and other assigned State agencies (not an independent entity) will review CFCM applications.
11	CFCM Service Requirements	Noah Chevalier	State Staff	State agency staff are given the role to perform initial functional assessments in EAD. Will there be more of a role for DHS staff beyond that initial assessment or is it just eligibility beyond that?	Yes, in addition to State agency staff completing the initial functional needs assessment, they will have other roles as well. In October 2023, EOHHS will post a comparison of roles and responsibilities under CFCM to help clarify roles across stakeholders.
12	Other	Chelsey Buxton	Community Partners MA	What is the age range for excluded children?	Over 19 years old.

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13	Other	Christine Ferris	Unknown	What role will support brokers be playing?	RI EOHHS does not anticipate many changes to the support broker role. The support broker service will continue to be an optional service for participants with intellectual and developmental disabilities (I/DD). This service will not be available to elders and adults with disabilities (EAD). There will be a Roles and Responsibilities document that we will post to the RI EOHHS CFCM website.
14	Other	Jennifer P. Crosbie	Shared Living Provider	Will there be draft revisions to Shared Living Standards?	Yes, revisions are being reviewed.
15	Other	John Susa	Parent	Will participants of this program be able to self-direct so they can select only what they need, or will they have to go through the entire process?	Per federal requirements, all Medicaid HCBS participants will be expected to have a conflict-free case manager; however, HCBS participants will drive the person-centered planning process to the best of their ability.
16	Other	Kathleen Heren	Unknown	How will all the open positions in state government affect this program?	EOHHS is continuing to work with DHS on business processes given the staff on hand. There is staff available to take on new assessments as they come onboard. EOHHS is cognizant of the workforce challenges across healthcare and is working to mitigate these challenges.
17	Other	Kathleen Heren	Unknown	If the government goes into shut down, how will this affect your dept?	Medicaid services will not be impacted by the government shut down.
18	Other	Maureen Maigret	Senior Agenda LTCCC	Will caregivers receive an assessment of their needs as part of the InterRAI?	The caregiver assessment is being worked into the process. EOHHS is continuing to refine where the best place is to have the assessment live to gather the data and provide the required reporting.
19	Other	Samuel Salganik	RIPIN	The initial CFCM Strategic plan had children as an excluded population. Is that still the case or will children be part of this new system?	Correct, children will be excluded from this population.
20	Other	Tony Fernandes	Unknown	What will the process be with s109 and s110 (request approvals and for additional funding) work?	Details are still being finalized. EOHHS anticipates that the case managers will submit requests for supplemental funding needs.
21	Stakeholder Engagement	Jennifer P. Crosbie	Shared Living Provider	Is there a plan for the State to schedule detailed discussions with Shared Living providers regarding potential impact for families seeking Shared Living?	Yes, detailed discussions will be scheduled.
22	Stakeholder Engagement	John Susa	Parent	How is EOHHS going to incorporate feedback from end users and families into the process?	RI EOHHS anticipates meeting with participants, parents, family members, and advocacy groups in October and November 2023. In addition, the state will engage the participants through an ongoing monitoring process.
23	Stakeholder Engagement	John Susa	Parent	How will end users get the opportunity to join the small group meetings to provide feedback?	RI EOHHS anticipates meeting with participants, parents, family members, and advocacy groups in October and November 2023. The meeting details will be available on the state's website.
24	Stakeholder Engagement	Nicholas Oliver	RI Partnership for Homecare	In addition to meetings with provider groups, will EOHHS be developing one-pagers and other collateral materials, guidance documents, etc. for providers?	Yes, additional one pagers and informational documents will continue to be provided. Documents on the website will be refined and updated. This will include documents not only for case management agencies, but for providers as well.
25	Stakeholder Engagement	Samuel Salganik	RIPIN	Is there going to be another presentation on participant- facing timelines? For participants, when will this become relevant? How will they find out?	Regarding "participant- facing timelines", this topic will be further discussed in EOHHS's all stakeholder meeting on Nov. 30, 2023.
26	Timeline	Robert Archer	Child and Family of RI	What is the timeline on the application to become a CFCM agency?	Anticipating a 3 month process from initial review of application to final review and certification, including enrollment with Gainwell (or reenrollment if already a Medicaid enrolled provider). The plan is to go live in January 2024 to begin receiving applications and complete certification by the end of March. The goal is to begin billing and provide services under the new codes in April.

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27	Training	Briana Bishop	Unknown	What will training for case managers look like?	EOHHS will share the training in the October meeting. There is a plan to meet with participants to review this training before it is shared. It will cover HCSB services provided through the state, person centered training and thinking, along with other aspects of the technology that will be used (WellSky, InterRAI). Case managers won't receive all training. It will depend on what they're actually doing.
28	Training	Jean DeSimone-Malone	Unknown	When do you foresee training for CFCM being created and who will provide training?	We have been working on the training since earlier this year and have an interagency group that meets weekly. The training will be ready by December 2023. Completion of training will depend on when the agency is ready to be certified.
29	Training	Peter Quattromani	Unknown	Will there be a separate certification standards and training required for the DD and elder populations?	Regarding "separate certification standards", there will be one combined certification standard and one certification process managed by EOHHS with support from program experts within BHDDH and OHA. EOHHS anticipates providing a standard set of training for all case managers and population specific training based on the population served by the case manager.
30	Training	Peter Quattromani	Unknown	Once these individuals are identified as conflict free certified managers, will there be any difference in the trainings they would receive based on the population they would be working with?	EOHHS anticipates providing a standard set of training for all case managers and population specific training based on the population served by the case manager.
31	Training	Samuel Salganik	RIPIN	Will CFCM entities still be required to use the WellSky system for documentation? Is that part of the training?	Yes, the intent is that WellSky is the program of record. EOHHS is working through development and finalization of the project and will have a better systems update next month.