

RI CFCM Implementation

Stakeholder Feedback Received Related to the State's Stakeholder Presentation on October 26, 2023

***Date Last Updated: November 15, 2023**

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Ref. #	Stakeholder Theme	Submitting Party Name	Stakeholder Affiliation	Question(s)/Comment(s)	RI EOHHS Response
1	CFCM Rate	Annette Bourbonniere	Unknown	Is there anyone building these models who has had to live as a recipient of services under this model?	We never want insinuate that we have the same exact lived experience as you or anyone else with a disability. We do have a large group of colleagues here at Guidehouse that have been licensed clinical social workers in the field, working as case managers. We also have parents with kids with developmental disabilities but again, we realize this is not the same which is why we do a lot of focus groups with different populations. We try to incorporate mixed perspectives to make sure we're taking your perspectives into account.
2	CFCM Rate	Christine Ferris	Unknown	Do the numbers (wages, expenses) presented represent the cost of living and doing business in RI or are they based upon surveys and results from other states?	It's a combination. Some of it is from the DD survey that was completed last year, some is public benchmark data from the Bureau of Labor Statistics that does national as well as state specific numbers, and then some data is from other public sources for transportation where we looked at average miles driven within the State. We used a mixture of data sources to benchmark and make sure things seem reasonable.
3	CFCM Rate	Claire Rosenbaum	Unknown	Where is the time accounted for plan writing (outside of face-to-face meetings), support coordination / referral attempts / other troubleshooting, etc. involved in plan development and monitoring?	This time was accounted for as part of case managers activities.
4	CFCM Rate	Corinne Russo	Unknown	What is the required education level for the case managers?	The case manager requirements are outlined in the certification standards that are posted on the RI EOHHS CFCM website. The requirements for case managers are designed around competencies rather than a particular educational level.
5	CFCM Rate	Corinne Russo	Unknown	How does this model relate to the present caseload of elderly clients? Do the elderly begin over again with DHS?	RI did not assess its present caseloads since the current case management requirements are different from CFCM. For the current members, it will not be a complete "begin over again" as case managers will review materials that were previously completed by the participant prior to beginning the person-centered planning process.
6	CFCM Rate	Heather Braga	Unknown	The 10% plus 15% is not adequate to cover required expenses. We have a 13% indirect rate, and that leaves 12% left for direct program expenses such as space costs, equip purchase/repair/maint, cell phones, translation, software/licensing as well as supervisor and direct support staff, which isn't sufficient.	The indirect costs used in the model are set at 25%, not 10%.
7	CFCM Rate	Heidi Ross	Unknown	Did you mention how much each case manager will get paid? And, with the current workforce shortage, can we get, the State, dinged for not meeting goals?	The CFCM rate calculation details use an approximate annual wage for a case manager of \$74,385.05. If a CFCM entity does not meet the State's CFCM requirements, the State may request a corrective action plan.
8	CFCM Rate	Linda Ward	Opportunities Unlimited, Inc.	Does the one rate apply to all services delivered within DD?	For CFCM, there will be one rate. This rate does not apply or related to direct services.

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9	CFCM Rate	Linda Ward	Opportunities Unlimited, Inc.	How did you arrive at 48 for a caseload?	RI EOHHS calculated an average caseload of 48. A 48-participant caseload is a conservative estimate and does not limit the case management entity from going above or below the estimate. The 48-participant caseload assumes an average HCBS participant receives approximately 34 hours of support a year.
10	CFCM Rate	Linda Ward	Opportunities Unlimited, Inc.	If you have smaller caseloads how will you cover the supervisor cost?	The supervisory cost does not relate directly to the caseload. The rate model assumed that there would be 1 supervisor to every 10 case managers. This is an additional cost that is part of the overall rate.
11	CFCM Rate	Rita Capotosto	Unknown	Have you taken into consideration that some of us have federally approved indirect cost rates that are higher than 10%?	The indirect costs used in the model are set at 25%, not 10%. We split it out into administrative versus program support so you can see the differential of how costs are distributed.
12	CFCM Rate	Rita Capotosto	Unknown	Is it presumed that the supervisor will carry a caseload and if so, what is the proposed caseload size? Does the model account for the program management functions of the supervisor for example budget management and monitoring; quality review of records; agency management meetings; work with HR on recruitment, hiring; monthly reporting to the agency Board and Senior Leadership team; meetings with funder and community partners, etc.	That's not how the model is built currently. If a supervisor is providing case management services as a true case manager, then they would be built in as if they were a case manager. We're only assuming that a supervisor spends 8 hours completing supervisory activities, which is what's built into the model and for the rest of their time there are other administrative or program support indirect costs that are built into that add-on. So there are 2 areas in which supervisory costs are built in, but they wouldn't get their own caseload in this model. That's the part of where we account for their costs in 2 spots. So one is in that supervisory add-on which you're going to see in the supervisor bucket in the rate model. So we're kind of doing a ratio essentially. And then the rest of that administrative type of cost related to their salary would be the administrative percentage that we add on.
13	CFCM Rate	Rita Capotosto	Unknown	What was the best practice benchmark used to presume 1:10 ratio of supervisor to staff?	Based on other state staffing models, supervisor staffing ratios typically range between 5-15. EOHHS selected a suggested supervisor ratio of 10 to allow for high quality oversight of case managers. Also note that case manager supervisors do not carry a caseload.
14	CFCM Rate	Sophie Santaella	Unknown	Does PTO contemplate FMLA?	The PTO estimates were pulled from a rate study that DD completed last year.
15	CFCM Rate	Sophie Santaella	Unknown	How much travel time for case managers is build into the caseload calculation?	For transportation, it is assumed that it is part of the case management activities. For example, when we have annual person center planning meeting, we know there's travel there. So that time, the 4 hours, may include transportation and the discussion with the participant as well as any documentation that's required to support that process.
16	Funding	Sam Salganik	RIPIN	Has EOHHS considered some sort of funding support for that startup period?	Funds were not appropriated for start up costs.
17	MCO	Chelsey Buxton	Community Partners MA	Will the roles and responsibilities document include how the MCOs/health plans will be involved in CFCM?	The posted roles and responsibilities documents do not include the MCOs; however, the State will continue coordinating with the MCOs regarding HCBS case management.

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18	MCO	Noah Chevalier	State staff	Can you expand more into transition of all of LTSS into managed care? Does this mean FFS will not be an option anymore?	Fee-for-service (FFS) will always be an option regardless of managed care. The new RFP for managed care organizations that is going out that will result in the contract for 2025 will have LTSS services as a part of the managed care plan; however, participants will be able to opt out and enroll in FFS.
19	MCO	Suzanne Carson	Unknown	If all LTSS clients will be shifting to MCO in the next few years, what will be the future of CFCM in regards to this model?	There's language that will be in the MCO contract that will give the MCOs the ability to contract with community agencies to provide the specific elements of the conflict-free case management for home and community based services.
20	Other	Crystal Moore	Unknown	How many agencies have reached out or shown interest in becoming CFCM certified?	As part of the State's request for information (RFI) request, three agencies expressed interest in applying. The State will have a better sense on capacity once its releases a CFCM application.
21	Other	Heidi Ross	Unknown	Since so many programs are tech based, will case managers be able to use their own emails to help clients who are not able to have or manage one? This is already a huge issue with the Medicaid Unwinding process.	Please follow-up with the State to clarify your comment.
22	Other	Linda Ward	Opportunities Unlimited, Inc.	What is InterRAI?	InterRAI is an assessment used for the EAD population, where as the DD population uses the SIS-A.
23	Process	Adam Keenan	Unknown	To confirm, IDD assessment/funding will be completed by the State and EAD assessment/funding will be completed by the conflict-free case manager? On the IDD side, the assessment lends itself to a tier level, is it the same thing on the EAD side...that InterRAI was going to be the assessment and then the funding level was determined from that?	For EAD, the State will perform the initial functional needs assessment (InterRAI). Case managers will complete the annual reassessment. For participants with I/DD, the State will continue to perform the initial functional needs assessment (SIS-A) and reassessments at five-year intervals. Yes, the InterRAI will determine the funding level.
24	Process	Annette Bourbonniere	Unknown	What happens to those of us already receiving case management? Personal Choice program (best thing RI ever did for adults with disabilities and that they have chipped away at ever since) is originally designed to give us choices and autonomy. This looks like it will take away choices.	It's not designed to take away your choice. During the transition period, if your current case manager becomes a certified conflict-free case manager, and you want to stay with that case manager, you still have that choice. The difficulty will be when we get to the end of the year, and certain agencies may have decided not to continue as a conflict-free case manager then there will have to be some transitions and some new selections of providers. It will be a transition over time that may or may not impact someone who is currently receiving services from an agency depending on whether that agency decides to continue on as a conflict-free case management agency under the new certification standards.

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25	Process	Corinne Russo	Unknown	Where is the point of entry into this system for elders? The Point? OHA? DHS?	For individuals looking to learn about their LTSS options (both public and private), they should contact MyOptionsRI, the Point, or any other community partner. There are multiple ways for individuals to learn about their LTSS options.
26	Process	Deb Burton	RI Elder Information	In the new database will you capture data on community caregivers such as the caregivers age and ability to continue in their caregiver role long term? For example caregiver in their 80's caring for a adult child with disabilities at home.	Yes, some of this information may be captured in the person-centered plan. In addition, the State anticipates rolling out a caregiver assessment tool in 2024 to help Rhode Island's unpaid caregivers access services and supports.
27	Process	Deb Burton	RI Elder Information	Will existing service providers be able to be part of the supported decision making team for an individual being changed over to the CFCM Agency?	The person-centered planning process will be led by the HCBS participant where possible. The participant will determine who (e.g., service providers, family members, etc.) will be part of this discussion.
28	Process	Deb Burton	RI Elder Information	How will the changes in LTSS and CFCM impact older adults receiving LTSS (or waiting for a healthcare worker to start LTSS)?	The State is currently developing a participant transition plan that will identify how older adults and others will transition into CFCM.
29	Process	Jennifer Allen	Unknown	Will the State continue to use WellSky or will they be merging over into Human Services that DHS uses now?	DHS is currently using WellSky they just have a different interface.
30	Process	Jennifer Allen	Unknown	During the certification process, when the CAP agencies are no longer doing the LTSS application, how is DHS going to keep a list of which CAP agency will get the client?	As part of their eligibility process, the member gets to select which case manager they want to receive their support from. So it's the members choice on which agency they want to be assigned to.
31	Process	Rose Marie Cazzani	Unknown	What changes will be made to LTSS qualification/application process?	For the EAD population, the change is that everyone will be using the InterRAI assessment. We will be using one assessment tool for to allow for ease of application. There will not be any changes in the LTSS qualification/application process for the DD population.
32	Process	Ruth Tureckova	Unknown	I thought that I/DD agencies can't do CFCM for I/DD. If this is true, all I/DD will have to go to a new case manager.	I/DD agencies that deliver services to Medicaid HCBS participants will be unable to provide case management services due to CMS's conflict of interest requirements.
33	Process	Sam Salganik	RIPIN	How will CFCM agencies find patients? How do you envision that matching of members to agencies to work?	We would not assume that finding patients would be the responsibility of the CFCM entity. Once the individual has gone through the eligibility process and they've had their assessment, we would refer them to case management. The individual first starts with the State process around eligibility and the assessment, and then we refer them to case management. Individuals will be able to choose which case management entity they wish to participate in if we have more than one agency meeting the CFCM certification standards. If we have more than one case management agency, the State will provide information on all agencies to ensure that individuals are able to make informed decisions about which agency they wish to connect with. The State will provide the case management entity with referrals.
34	Process	Sam Salganik	RIPIN	Can CFCM agencies reject referrals? Or "close" to new referrals? If they don't have enough staff? Will be especially important for CFCM agencies as they are staffing up and conducting initial training, etc.	The State is still working through what it's process for referrals will be, and certainly that will be an aspect that the State looks at when it develops this policy.

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35	Process	Suzanne Carson	Unknown	If it is the members choice on agency, what if the case management agency is at capacity and cannot accept the client? What will be the process?	The State is still working through this process. The State does not expect to make assignments to CM entities that are at or over capacity.
36	Process	Peter Quattromani	Unknown	How are the existing 4,500 adults with developmental disabilities going to transition into CFCM?	The State is currently developing a participant transition plan that will identify how these participants and others will transition into CFCM.
37	Stakeholder Engagement	Linda Ward	Opportunities Unlimited, Inc.	Will there be public comments allowed/required if any changes are proposed for licensing regs?	Yes, there will be a public comment process.
38	Timeline	Beth Guarneri	Unknown	When will current plan writers know the timeline to end with current families and the process? Many families are asking questions.	This is currently under development. Once we are ready to begin that process, people will be notified and we will have materials to help explain what will happen, help people to decide which case management agency they would prefer, and explain the overall process.
39	Timeline	Linda Ward	Opportunities Unlimited, Inc.	Timeframes to respond to referrals and submission of person centered plan are very short - how did you arrive at this?	The timeframes were defined based on other state approaches and state staff experience with existing programs. The state anticipates clarifying all required timeframes and expectations.
40	Training	Jennifer Allen	Unknown	For those that have been trained on the InterRAI, do they still need to go through the training?	No.
41	Training	Joanne Malise	Unknown	Does the State have access to the list of people who received PCP training at the Sherlock center and will the state be reaching out to those people for interest in CFCM?	Yes, the State has access to the list of people who received PCP training at the Sherlock center and will be reaching out to those people for interest in CFCM.
42	Training	Linda Ward	Opportunities Unlimited, Inc.	When will the actual content of training be available for review?	We will discuss with stakeholders in the upcoming monthly CFCM stakeholder meetings and we expect the training content to be available by December 2024.