

RI EOHHS

CMS Corrective Action Plan: Implementation of CFCM

Updated: 11/2/2023

Red font = Updates since:

Color/Bold Highlight = Milestone

| Ref. | Objective  | Activity  | Deliverables   | Start Date    | Target Completion Date | Responsible Party | Status Updates | Date Completed or latest update |
|------|--|---|--|---------------|------------------------|-------------------|----------------|---------------------------------|
| 1    | Create a CFCM strategic plan                                     | Post a draft CFCM Strategic Plan  | CFCM Strategic Plan  |               | 11/30/2022             | RI EOHHS          | Complete       | 11/30/2022                      |
| 2    |  | Post stakeholder feedback and State responses   | Stakeholder feedback summary   |               | 2/10/2023              | RI EOHHS          | Complete       | 2/20/2023                       |
| 3    |  | Post an updated CFCM strategic plan   | CFCM Strategic Plan  |               | 2/28/2023              | RI EOHHS          | Complete       | 5/8/2023                        |
|      |  | Update CFCM Strategic Plan  | Update CFCM Strategic Plan   | 10/1/2023     | 12/1/2023              | RI EOHHS          | In Process     | 11/2/2023                       |
| 4    | Conduct stakeholder engagement                                   | Provide fact sheets and other stakeholder materials to support implementation   | Various stakeholder materials  | 1/1/2023      | ongoing                | RI EOHHS          | Complete       | 7/10/2023                       |
| 5    |  | Update the State's website regarding CFCM activities and upcoming webinars  |  | 1/1/2023      | ongoing                | RI EOHHS          | In Process     | 11/2/2023                       |
| 6    |  | Conduct small group sessions with stakeholders to support implementation  |  | 1/1/2023      | ongoing                | RI EOHHS          | In Process     | 11/2/2023                       |
| 7    |  | Stakeholder meeting   |  | 9/28/2023     | 9/28/2023              | RI EOHHS          | Complete       | 9/28/2023                       |
|      |  | Stakeholder meeting   |  | 10/26/2023    | 10/26/2023             | RI EOHHS          | Complete       | 10/26/2023                      |
|      |  | Stakeholder meeting   |  | 11/30/2023    | 11/30/2023             | RI EOHHS          | Not Started    |                                 |
|      |  | Stakeholder meeting   |  | 12/14/2023    |                        | RI EOHHS          | Not Started    |                                 |
| 8    | Issue an RFI to potential CFCM vendors                           | Analyze existing data to determine where Medicaid HCBS participants are receiving services across the state. This analysis will be included in the State's RFI as well as the RFP |  | 1/23/2023     | 7/17/2023              | RI EOHHS          | Complete       | 7/26/2023                       |
| 9    |  | Develop and post an RFI to CFCM vendors and analyze results   | RFI  | 2/2/2023      | 4/14/2023              | RI EOHHS          | Complete       | 4/7/2023                        |
| 10   |  | Conduct stakeholder engagement  | Stakeholder presentation   | 3/1/2023      | ongoing                | RI EOHHS          | Complete       | 4/7/2023                        |
| 11   |  | Assess RFI responses and update the State's CFCM Strategic Plan (as needed)   |  | 4/11/2023     | 4/17/2023              | RI EOHHS          | Complete       | 4/7/2023                        |
| 12   | Create a Participant Transition Plan                             | Develop and post a draft Participant Transition Plan  | Draft Participant Transition Plan  | 3/1/2023      | 12/8/2023              | RI EOHHS          | In Process     | 11/2/2023                       |
| 13   |  | Conduct stakeholder engagement  | Stakeholder presentation   | 5/25/2023     | 12/14/2023             | RI EOHHS          | Not Started    |                                 |
| 14   |  | Post the final Participant Transition Plan  | Final Participant Transition Plan  | 12/8/2023     | 12/31/2023             | RI EOHHS          | Not Started    |                                 |
|      |  | DHS conducts all initial assessments  | DHS Staff conduct new member initial assessments using InterRAI                                    | 12/31/2023    | ongoing                | DHS               | Not Started    |                                 |
|      |  | CFCM Providers develop Person Centered Plans  | PCP  | 1/1/2024      |                        | CFCM provider     |                |                                 |
| 15   | Assess whether RI's SPA or 1115 waiver require changes           | Assess whether RI's SPA or 1115 waiver require changes  |  | None Required |                        | RI EOHHS          | Complete       | 7/10/2023                       |
| 16   |  |   |  |               |                        |                   |                |                                 |
| 17   |  |   |  |               |                        |                   |                |                                 |
| 18   |  |   |  |               |                        |                   |                |                                 |
| 19   | Update existing State specific materials (rules and regulations) | Identify all existing State specific materials that require updates   | Listing of state specific materials that require updates   | 1/1/2023      | 2/28/2023              | RI EOHHS          | Complete       |                                 |
| 20   |  | Update State Regulations  |  | 2/28/2023     | 6/1/2024               | RI EOHHS          | In Process     |                                 |
| 21   |  |   | Rules, Regulations, and Standards for Certification of Case Management Agencies (218-RICR-40-00-5) |               |                        | OHA               |                |                                 |
|      |  |   | 212-RICR-10-05-1 1.9 Development of an Individualized Service Plan                                 |               |                        | BHDDH             |                |                                 |
|      |  |   | Title 212, Chapter 10 - Rules and Regulations for DDOs   |               |                        | BHDDH             |                |                                 |

|    |  |   |  |            |            |  |             |            |
|----|--|---|--|------------|------------|--|-------------|------------|
|    |  |   | 212-RICR-10-05-1 1.3.1<br>Fiduciary Duties for the<br>Management of Participants'<br>Funds   |            |            | BHDDH                                    |             |            |
|    |  |   | Medicaid Long-Term Services<br>and Supports: Home and<br>Community-Based Services<br>(HCBS)" (210-RICR-50-10-1)  |            |            | RI EOHHS                                 |             |            |
|    |  |   | Medicaid Long-Term Services<br>and Supports Overview and<br>Eligibility Pathways (210-RICR-<br>50-00-1)  |            |            | RI EOHHS                                 |             |            |
|    |  |   | Medicaid Long-Term Services<br>and Supports Application and<br>Renewal Process (210-RICR-<br>50-00-4)  |            |            | RI EOHHS                                 |             |            |
|    |  |   | Medicaid Long-Term Services<br>and Supports:<br>Functional/Clinical Eligibility"<br>(210-RICR-50-00-5)   |            |            | RI EOHHS                                 |             |            |
| 22 |  | Post updated rules and regulations  | Rules and regulations  |            |            | RI EOHHS                                 | In Process  | 11/2/2023  |
| 23 |  | Public comment  | SOS posting and interested<br>parties email  |            |            | RI EOHHS                                 | Not Started |            |
| 24 |  | Adopt rules and regulations   |  |            | 6/1/2024   | RI EOHHS                                 | Not Started |            |
| 25 |  | Full alignment of State rules and regulations   | Rules and regulations  |            | 6/1/2024   | RI EOHHS                                 | Not Started |            |
| 38 | Develop and implement<br>CFCM Training<br>Curriculum     | Establish Advisory Committee  | Interagency advisory team to<br>guide curriculum<br>development  | 5/15/2023  | ongoing    | RI EOHHS                                 | Complete    | 7/10/2023  |
| 39 |  | Develop Comprehensive Training Plan   | Training Plan outline  | 6/15/2023  | 8/15/2023  | RI EOHHS                                 | Complete    | 9/7/2023   |
| 40 |  | Module Development  |  | 9/19/2023  | 12/30/2023 | RI EOHHS                                 | In Process  | 11/2/2023  |
| 41 |  | Provider Learning   |  | 12/15/2023 | ongoing    | RI EOHHS                                 | Not Started | 9/7/2023   |
| 42 |  | Systems Change & manual<br>InterRAI training  | Manuals & Memos  | ongoing    | ongoing    | Wellsky                                  | Not Started | 9/7/2023   |
|    |  |   |  | 1/30/2024  | Ongoing    | RI EOHHS                                 | Not Started | 11/2/2023  |
| 46 |  | Completion of Curriculum for all CF managers<br>Transition of Curriculum Oversight to Vendors |  | 1/1/2024   | ongoing    | CFCM vendors                             | Not Started |            |
| 48 |  | Phase I   | Person Centered Options<br>Counseling (PCOC)   |            |            | WellSky                                  | Complete    |            |
| 49 |  | Phase II  | 1. CFCM for NHTP/MFP &<br>Hab. Create appropriate<br>screens/forms within the<br>Wellsky system to create a<br>person record and develop a<br>person centered plan<br>2. Eligibility & Case<br>Management Interface w/ IES<br>(RIBridges)<br>3. LOC interface w/ IES<br>(RIBridges)<br>4. Enrollment & Prior<br>Authorization Interface w/<br>MMIS | 7/1/2022   | 4/1/2024   | WellSky<br>Deloitte<br>Gainwell<br>EOHHS | In Process  | 11/6/2023  |
| 50 |  | Phase III   | 1. CFCM for all other<br>programs: Core, Self Directed,<br>DD<br>2. Transition OHA to Wellsky<br>Human Services platform   | TBD        | TBD        | WellSky<br>Deloitte<br>Gainwell<br>EOHHS | Not Started | 9/11/2023  |
| 51 |  | Data & Reporting for CFCM   | Develop file sharing process<br>to create whole person<br>reporting to include CFCM<br>within EOHHS internal<br>analytics team   | 11/1/2022  |            | Wellsky<br>DoIT<br>EOHHS                 | In Process  | 9/11/2023  |
| 52 |  | Create CFCM procedure code within MMIS  | 1. Develop a code and rate<br>and implement that within<br>MMIS<br>2. Code will need proper edits<br>and audits set to prevent<br>billing errors<br>3. Create CFCM provider type<br>for billing  | 4/15/2023  |            | EOHHS<br>Gainwell                        | In Process  | 9/11/2023  |
|    |  | WCMS full implementation  |  | 2/1/2025   | 2/1/2025   | WellSky                                  | Not Started |            |
| 52 | Develop a payment<br>methodology and rate for<br>CFCM    | Develop a draft CFCM reimbursement rate   |  | 11/30/2022 | 11/30/2022 | RI EOHHS                                 | Complete    | 11/30/2022 |
| 53 |  | Identify a procedure code to support CFCM billing<br>and work with the MMIS vendor            |  | 1/1/2023   | 10/1/2023  | RI EOHHS                                 | Complete    | 7/10/2023  |
| 54 |  | Update the CFCM reimbursement rate as needed<br>based on changes to the FY2024 budget         |  | 7/3/2023   | 10/1/2023  | RI EOHHS                                 | Complete    |            |
| 55 |  | Conduct stakeholder engagement to review the<br>State's CFCM reimbursement rate               | Stakeholder presentation   | 7/3/2023   | 10/28/2023 | RI EOHHS                                 | Complete    | 11/2/2023  |
| 56 |  | Post the final CFCM reimbursement rate  |  | 8/1/2023   | 10/28/2023 | RI EOHHS                                 | Complete    | 11/2/2023  |
| 57 |  | Update the Provider Reference Manual for HCBS   | Provider Reference Manual for<br>HCBS  | 8/1/2023   | TBA        | RI EOHHS                                 | Not Started | 8/30/2023  |
| 58 | Obtain funding to<br>support CFCM services<br>for FY2024 | Provide high-level budget estimates/impact  |  | 12/31/2022 | 12/31/2022 | RI EOHHS                                 | Complete    | 12/31/2022 |
| 59 |  | Submit budget estimates for the Governor's<br>proposed FY2024 budget                          |  | 12/31/2022 | 12/31/2022 | RI EOHHS                                 | Complete    | 12/31/2022 |
| 60 |  | Respond to written or oral testimony in GA<br>hearings  |  | 12/31/2022 | 7/1/2023   | RI EOHHS                                 | Complete    | 7/10/2023  |

|    |   |   |                                  |           |            |                      |             |           |
|----|---|---|----------------------------------|-----------|------------|----------------------|-------------|-----------|
| 61 |   | General Assembly passes final FY2024 budget . Governor signs.   |                                  | 6/1/2023  | 6/30/2023  | General Assembly     | Complete    | 7/10/2023 |
| 62 | Certification for CFCM providers                        | Develop certification standards for CFCM providers  | Certification standards for CFCM | 8/31/2023 | 10/1/2023  | RI EOHHS             | Complete    |           |
| 63 |   | Post Certification standards for public comment   |                                  | 10/1/2023 | 11/1/2023  | RI EOHHS             | Complete    | 11/2/2023 |
| 64 |   | Finalize Certification standards  |                                  | 11/1/2023 | 12/1/2023  | RI EOHHS             | In Process  | 11/2/2023 |
| 65 |   | Conduct Provider certification  |                                  | 12/1/2023 | 12/31/2024 | RI EOHHS, BHDDH, OHA | Not Started |           |
|    | Develop Medicaid Provider Manual                        |   |                                  | 9/13/2023 | 12/1/2023  | RI EOHHS, BHDDH, OHA | Not Started |           |
|    | Medicaid Enrollment for CFCM certified providers        | Provider enrollment   |                                  | 12/1/2023 | 12/31/2024 | RI EOHHS             | Not Started |           |
| 66 | Member Communication Member transition to CFCM provider | Communicate to eligible Medicaid HCBS participants regarding conflict-free case manager transitions. This will adhere to the State's Participant Transition Plan. | Communication materials          | 11/1/2023 | 12/31/2024 | RI EOHHS             | Not Started |           |
| 67 |   | Transition all eligible Medicaid HCBS participants into CFCM according to the Participant Transition Plan   |                                  | 1/1/2024  | 12/31/2024 | RI EOHHS             | Not Started |           |