



YOUR LIFE
YOUR CARE
YOUR PEOPLE

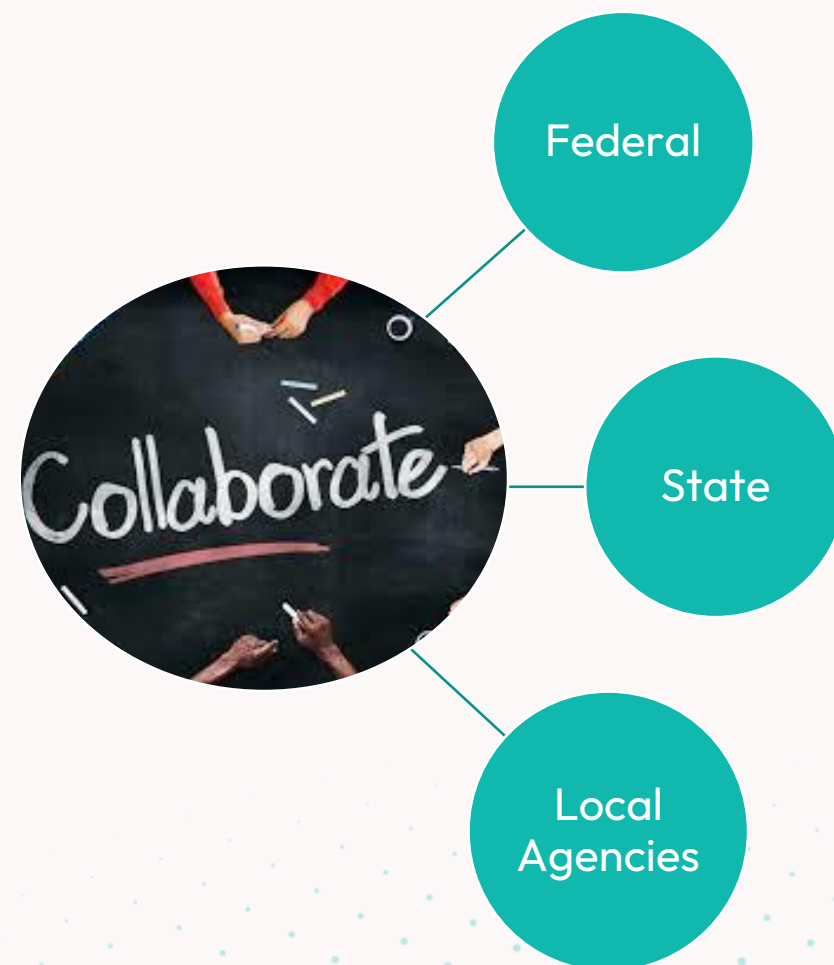
Proactive Program Integrity within Self-Direction

2025 Applied Self-Direction
Virtual Conference



Program Integrity

- Program integrity refers to the measures taken by government agencies to ensure that taxpayer dollars are spent appropriately, effectively, while preventing fraud, waste and abuse





Self-Direction: New Jersey & Arkansas

- New Jersey & Arkansas have a long-history self-direction care, more specifically as one of the initial states, along with Florida, to participate in the Cash and Counseling Demonstration and Evaluation.
- Based on the success of the project, CMS added self-direction to 1915(c) waivers by 2002 and added 1915(j) in 2007.



Self-Direction: New Jersey & Arkansas

- In 2008, CMS approved NJ's 1915(j) state plan amendment (SPA) adding cash and counseling program for self-directing personal care services, known as the **Personal Preference Program (PPP)**.
- **PPP** has been serving NJ FamilyCare/Medicaid members for over 23 years.
- In 2007, CMS requested Arkansas to submit a 1915(j) to replace the 1115 Demonstration for self-directing personal care services known as **Independent Choices (IChoices)**
 - **IChoices** has been serving Arkansas Medicaid members for over 24 years.

Proactive Program Integrity In Self-Direction

Opportunities throughout the program's tenure:

- I. Review identified challenges
- II. Reconsider solutions
- III. Innovate service delivery with our community members, advocacy partners, health plans and Fiscal Intermediary's (FI)

Through these experiences, both NJ & AR have learned best practices that guide approaches to support self-direction for the people we serve now and in the future.

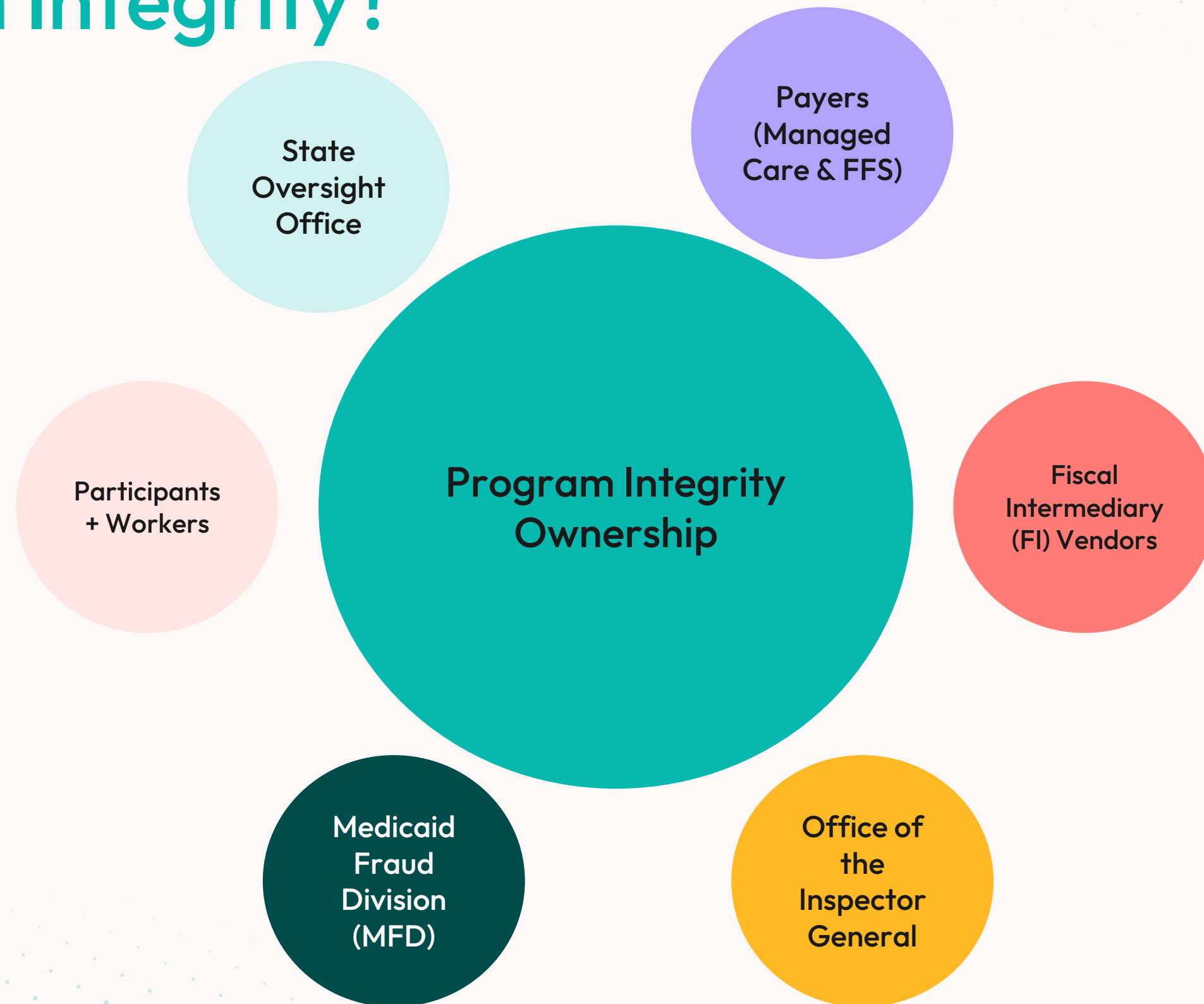




Lessons Learned

- 1. Do not presume to know what participants and their caregivers want or need.**
 - If you don't know, just ask
- 2. Our community's voice is an integral part of growth and improvement.**
 - Added quarterly PPP Partners Gathering meeting
 - Include community members when reviewing PPP member-facing communications
 - AR quarterly advisory council
- 3. Self-direction programs continue to contend with fraud, waste and abuse narratives.**
 - The same applies to any Medicaid provided service

Who is Responsible for Program Integrity?





Program Integrity Approach

Program Integrity Elements

- **Eligibility Verification:** Ensuring individuals meet the requirements to participate in a program
- **Provider Compliance:** Verifying providers meet federal and state participation requirements
- **Payment Accuracy:** Ensuring payments are made in the correct amount and for appropriate services
- **Fraud Detection & Prevention:** Implementing measures to identify and prevent fraudulent activities – informing the participant/client about program rules
- **Audits & Reviews:** Conducting audits and reviews to ensure compliance and identify areas for improvement

NJ Program Integrity Element:

Eligibility Verification

Where NJ **STARTED**

- PPP participants must be eligible for Medicaid services
- NJ Medicaid verifies Medicaid eligibility for Fee-For-Service (FFS)

Where NJ is **NOW** = Where NJ started +

- Managed Care Organizations (MCOs) verify eligibility for NJ FamilyCare (NJFC) for MCO enrolled members

Where NJ is **GOING** = Where NJ is now +

- Define and implement verification practices to ensure timely eligibility verification for MCOs and FFS

AR Program Integrity Element: Eligibility Verification

Where AR **STARTED**

- IChoices participants must be eligible for Medicaid services
- Didn't have sufficient reporting to be informed timely of loss of eligibility or timely of a reinstatement of eligibility
- Monitoring and oversight of budgets and utilization was manual and cumbersome

Where AR is **NOW** = Where AR started +

- DAABHS IC specialists verify eligibility for enrolled members with re-confirmation check points daily and weekly.
- Information communicated to FI contractor and DHS RN through reporting

Where AR is **GOING** = Where AR is now +

- Improvements to current reporting, overall, these processes are highly effective in program oversight
- Initial verification prior to enrollment
- Daily and Weekly reporting that allows us to know when client has lost eligibility or eligibility has been reinstated

NJ Program Integrity Element: Provider Compliance

***PPP identifies providers as workers/caregivers
providing care to PPP Participants**

Where NJ **STARTED**

- FI educates and supports PPP participants with provider compliance requirements.
- PPP participants oversees provider compliance of self-hired providers
- PPP providers adhere to program rules and requirements

Where NJ is **NOW** = Where NJ started +

- MCOs support PPP members with PPP compliance and its impact on PPP providers

Where NJ is **GOING** = Where NJ is now +

- **MCOs and contracted Fiscal Intermediaries** support PPP members with understanding compliance and its impact on PPP providers
- Implement reporting and oversight activities for MCOs and FIs demonstrating compliance with program rules for workers.

AR Program Integrity Element: Provider Compliance

***IChoices identifies workers/caregivers as
Providers to the IChoices Clients**

Where AR **STARTED**

- FI provided management of financial paperwork and budget changes for pay allocation
- FI provided minimal education and supports
- Program management and support was managed in house by DHS counselors
- FMS/SD specialists oversee provider and participant compliance
- Self-Direction providers adhere to program rules and requirements

Where AR is **NOW** = Where AR started +

- FI provides Information & Assistance and Financial Management support to clients and providers
- Partnership between FI and SD specialists to oversee compliance
- QA Reports- to monitor accuracy between the database versus the MMIS system
- Underutilization Report Analysis

Where AR is **GOING** = Where AR is now +

- Contracted support outside of FI who audits EVV claims for duplication of services/Fraud
- DAABH/DHS educating contracted supports on self-direction program
- FI providing program compliance webinars for DHS staff.
- FI to provide EVV Compliance webinars to clients and providers

NJ Program Integrity Element:

Payment Accuracy

Where NJ **STARTED**

- FI educates and supports PPP participants with managing payment accuracy for self-hired workers
- Worker submit timesheets to PPP participant for review and approval
- PPP members approve provider timesheets

Where NJ is **NOW** = Where NJ started +

- NJ PPP State Program Office (SPO) and its FI implement payment pending rule requiring review of timesheets that go over the PPP member's approved monthly budget

Where NJ is **GOING** = Where NJ is now +

- Implement utilization review requirements for MCOs to proactively support PPP members and workers with proactively managing services within the approved monthly budget

AR Program Integrity Element:

Payment Accuracy

Where AR **STARTED**

- FI supported self-direction participants with managing payment accuracy for self-hired workers
- Participant submitted timesheets to FMS for payment approval
- FI approved payment on timesheet upon review of authorized plan of care

Where AR is **NOW** = Where AR started +

- Participants' budgets are monitored by FI to ensure the provider isn't paid more than the Plan of Care allows. Budgets are compared to authorized Medicaid budget
- Medicaid Reconciliation-DHS monitors the use of Medicaid funds that are disbursed on behalf of the beneficiaries.
- Reports that monitor utilization and underutilization of budgets

Where AR is **GOING** = Where AR is now +

- Electronic automation of budgets to eliminate manual entry and keying errors which impact payment accuracy
- Creating more robust QA reporting utilized by both FI/DHS
- Potential change of payment methodology to better serve and control payment accuracy

NJ Program Integrity Element: Fraud Detection & Prevention

Case Review: RACI Matrix
Responsible Accountable Consulted Informed

Where NJ **STARTED**

- FI educates and supports PPP participants with understanding fraud, waste and abuse detection and prevention expectations for program participation
- FI re-educates PPP members and workers during required quarterly face-to-face meeting.
- PPP SPO reviews reported cases of fraud
 - In instances of substantiated fraud: FI vendor engages with PPP participant and/or worker to recoup inappropriately paid funds

Where NJ is **NOW** = Where NJ started +

- PPP SPO **and MCOs** review reported cases of fraud
 - In instances of substantiated fraud: FI vendor engages with PPP participant and/or worker to recoup inappropriately paid funds.
 - MCOs submit case to its Special Investigation Unit (SIU) for potential submission to the Medicaid Fraud Division (MFD)

Where NJ is **GOING** = Where NJ is now +

- Implement utilization review requirements for MCOs to proactively support PPP members and workers with managing services within the approved monthly budget

AR Program Integrity Element: Fraud Detection & Prevention

Where AR STARTED

- DHS Self-Direction Counselors did desk audits on client files and requested timesheets from FI to review payment disbursement against authorized budget (POC)
- Limited reports available ex Hospitalization, Nursing Homes
- Allowed budget funds to be reduced and put into an account for discretionary funds affecting budget use for care needs.
- Reported suspected fraud to OMIG

Where AR is **NOW** = Where AR started +

- Partner with OMIG: Ensure understanding of how your Self-direction program works and what safety's you have in place to prevent fraud.
- Quarterly meetings with OMIG and established reporting mechanism.
- Quality Assurance Checks in Data Analysis for early detection of fraud and misuse of funds

Where AR is **GOING** = Where AR is now +

- Develop more robust Q/A reporting
- Continue with existing communications and partnership with OMIG
- More FWA webinars with clients and providers
- Require Fraud Prevention video as part of the enrollment process
- FI's website to contain FWA videos for reference

Program Integrity Element: Audits & Reviews

Where NJ STARTED

- PPP SPO and FI review PPP participant utilization for overpayments, fraud, waste and abuse of program funds
- Office of the Inspector General (OIG) PPP audits
- Office of State Comptroller (OSC) PPP audits

Where NJ is NOW = Where NJ started +

- Based on OIG / OSC audit findings, SPO implements best practice recommendations to improve program oversight
- MCOs submit quarterly fraud report of member and worker fraud cases activities to PPP SPO
- PPP SPO reviews report and provides MCOs with guidance/feedback on next steps as needed

Where NJ is GOING = Where NJ is now +

- Implement utilization review requirements for MCOs that proactively review PPP members for disqualifying events, such as hospitalization and facility admissions

Program Integrity Element: Audits & Reviews

Case Review: Process Mapping Workflow

Where AR **STARTED**

- DHS Nurses (RN) reviewed Plan of Care Activity while SD Counselors handled everything manually through desk audits and paper file pulling
- Had a Q/A department for auditing of the program
- Kept accurate documentation and paper files that were also monitored by Q/A team
- Reports to the Inspector General (OIG)

Where AR is **NOW** = Where AR started +

- Self-Direction in Arkansas has established reporting for all areas of the program.
- Our reporting and processes are integrated into the managing of the program which allows us to detect any issues promptly in real time.
- Robust Team of Auditors – System to system comparison and analytics (DMS, FI, SD Team, EVV vendor)

Where AR is **GOING** = Where AR is now +

- Continue to develop robust reporting as the programs changes and grows
- Continue to have auditing provided by outside contractor for EVV



The Future: Program Integrity Improvements

- Electronic Visit Verification: Tracking performance and working with stakeholders to engage non-compliant participants and workers
- Drop Down Q & A to verify eligibility for specialty time submissions
- Increased Data Analytics
- Consistent review of pend rules for time submissions
- FWA Tracking & Member Education



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