

CSP of SD Family Support Workgroup Issue Brief and Provider Recommendations

The following information was gathered via three conference calls with the following Family Support providers: Black Hills Special Services Cooperative, Dakota Milestones, LifeScape, LifeQuest, VOA, CFI, and SEDDAC. The information shared during these calls focused specifically on voucher processing, remittance advice, vendor payments, and other time intensive tasks related to the administration of the family support programs relevant to CSPs. It is important to note that the issues outlined below, and the subsequent recommendations, are solely focused on the issues stated above. Additionally, many of the topics overlap with one another. Any issue summary or recommendation in this report does not represent an overall solution to broader concerns with the Family Support program. CSP of SD encourages further discussions between state regulators and providers to improve the overall effectiveness of the Family Support program. This document is organized into two sections: Family Support Issue Brief and Family Support Provider Recommendations.

Family Support Issue Brief

Voucher Processing

Items discussed within this topic included receipts and invoices/time scanning and uploading, purchase reconciliation, credit card receipts, FOCO, cash flow, large purchases, and turnaround time on approval of large purchases.

Primary Issues:

1. **Processing time** – The amount of pre-work and time it takes to perform the related tasks with vouchers quickly exceeds the amount of administrative reimbursement. Specific tasks include:
 - a. Processing numerous invoices (e.g. 150-600 invoices per month). This then must be reconciled with what the CSP pays out and what the service coordinator submits, which takes additional time. This process also includes scanning and uploading receipts to computer systems, ordering items, returning items, and reconciling credit card statements. There is also a significant amount of time taken in tracking items with multiple spreadsheets that are complex.
 - b. Denials are occurring more frequently and the added time in dealing with these situations has increased.
 - c. It was noted on several occasions that non-reimbursable time is increasing.
 - d. The new 799 forms and budgets are not being updated quickly enough which increases following up time.
 - e. Increase in time for internal audits and questions related to the program from auditors.
2. **Cash Flow and Large Purchases** – When a large purchase is made (e.g. when vehicles are converted to accessible), the CSP pays those costs up front, and reimbursement for these purchases takes a significant amount of time creating cash flow issues.

Remittance Advice

Items discussed within this topic included purchase/service denials, payment reconciliation (e.g. large purchases, payroll, broken up payments, timeliness), FOCO IT System, and communication.

Primary Issues:

1. **Payment/Service Denials** – As indicated above, denials are occurring more frequently and regularly involve duplicate service dates, name changes, and service codes. As a result, numerous changes must be made in FOCoS, which increases non-reimbursable time. Other related issues include:
 - a. Payments to CSPs are broken up making it difficult to reconcile.
 - b. Cash flow related to large purchases (see above).
 - c. When added to the payroll process, the amount of non-reimbursable time increases significantly.
 - d. Timeliness of payments is lacking which adds to the non-reimbursable time.
2. **FOCoS IT System** – There are some system limitations to FOCoS that include reporting and tracking capabilities, and basic issues such as the amount of “clicking” it takes to navigate the system. Some additional observations include:
 - a. Training is minimal in the FOCoS system and additional features could be present, but they have not been communicated or trained.
 - b. The FOCoS system may have some updates already available.
3. **Communication** – Response time on a variety of different items is typically slow which requires more time in follow up and double checking.
 - a. ***What are the state’s expectations for what falls under administration fees and what falls under SC reimbursable fees? What happens if there are clearly expenses present and directly related to Family Support but are not reimbursable?***

Vendor Payments

Items discussed within this topic included vendor set up, general internal controls/tracking, and using Amazon as a vendor.

Primary Issues:

1. **Adding new vendors** – This takes considerable time and includes:
 - a. Obtaining 1099 form if the vendor is providing services, setting up PO and direct billing/charge accounts.
 - b. Credit card purchases are balanced by business office and the paperwork must be completed by the service coordinator.
 - c. Assisting families in finding lodging for medical travel and setting up direct billing accounts with those establishments.
 - d. The more people that are added to caseloads (or at capacity), or if a new program is added, increases the administrative responsibilities, yet the reimbursement does not increase.
2. **General internal controls and tracking** – The tracking, logging, and matching of transactions requires considerable time and includes:
 - a. Service coordinator FOCoS entry on their end, each invoice/reimbursement to family/vendor is then logged on the CSP end and matched to the FOCoS system.
 - b. If there are discrepancies in amounts the process continues until the matter is resolved. This can include pulling the original invoices and email and follow up messages with families, coordinators, and vendors all which requires additional time.

- c. Returned items also cause additional time and tracking with all parties involved and then corrections need to be inputted into FOCoS.
- 3. Using Amazon as a vendor** – While the retail website is convenient for families, the system adds additional paperwork and other processes (e.g. printing invoices, additional wait time for invoices depending on shipment date, matching between PO sent by the service coordinator and printed Amazon invoices, checks are printed and then matched with paperwork). Obviously, the state and CSPs are not in control of this situation, but it's important to note because the customers of the Family Support program recognize the convenience and quality of this system. Our system of service (DDD & CSP) also need to recognize this and respond in a way that assures continued use in a fashion that's sustainable for families, DDD, and providers.

Other Time Intensive Tasks

The issues in this section were discussed broadly and not as specific as the items above. As a result, they are presented as a list rather than the above format.

- Slow approval time of 799 forms (internal and state), tracking submitted 799 forms (submitted but not approved).
- General tasks (filing, phone calls, scanning, uploading, catching up when everything gets final approval).
- Bi-weekly calls, SMART review completion, Internal audits (audits take longer and in some cases are half of an agencies transactions), the audits generate lots of questions and add time to the whole process.
- Supervision of the program averages approximately 8-10 hours per week.
- Skepticism on how much time it will take to market, recruit, and manage the waiting list. This will not be reimbursable time.
- Determining budget surplus or deficit report was very time consuming. All agencies were required to perform this task and all CSPs reported that it took a considerable amount of time. Will this become a regular activity?
- Overall issues with FOCoS and file zilla for the 799 forms.
- Budget amendments not being updated/approved.

Family Support Provider Recommendations

Many of the primary issues identified above have overlapping topics that apply to more than one area. These overlapping areas generally fall into three themes: administrative processes (CSPs and DDD), information technology, and general communication. The recommendations below will fall under these three headings. The recommendations will have a brief explanation and indicate if the recommendation is geared toward CSPs or DDD.

Administrative Process Recommendations

1. *Creation of CSP best practice workgroup (CSP FS Providers):*

Explanation - During the discussions leading to this document, two questions emerged. First, are the administrative activities that CSPs perform simply top heavy and in need of individual organizational improvement/overhaul? Or have the administrative activities increased to the point that more financial resources are the answer? While there was no solid answer that

emerged, it was apparent that it likely is a combination of both. However, the workgroup agreed that a support group consisting of financial staff and Family Support coordinators would be beneficial for all and would primarily focus on best practices that reduce and streamline administrative activities. The support group will be coordinated by association members.

2. Conduct a financial analysis of administrative reimbursement and update the administrative reimbursement model (DDD & FS Provider CSPs):

Explanation – Along with the best practice workgroup recommendation, it was also clear through our discussions that administrative burdens have increased and will continue to increase as the program expands and caseloads run at capacity. It was noted several times, that the number of hours and administrative effort exceeds the amount reimbursed and the flat rate needs updating. The analysis would need to take into consideration, number of hours dedicated to the program and other overhead costs such as copying, technology, audits, postage and other cost considerations.

3. Establish notification and response time standards (DDD & FS Provider CSPs):

Explanation – This area of concern is closely related with general communication issues but was specific enough to have its own recommendations and includes three main areas. The goal of these recommendations is to establish consistent timelines for responses and to prevent regular double checking and minimize confusion. Consultation with the state is needed before proposing exact timelines and systems. CSPs will also need diligence in response time and other critical communication as well.

a. Notification system for approval and denial of vouchers/purchases – The ideal system would include an automated notification that lets CSPs know immediately when a purchase was approved or denied, as well as a time frame of when a decision can be expected. This would eliminate regular double checking and establish consistency.

b. Budget updates and 799 form approvals – This is the same situation as above. Budget updates are inconsistent in their approval as well as 799 forms. The workgroup acknowledged that there is a time frame for 799 forms, although it was noted that it takes a considerable amount of time and requires the CSP to constantly check back to see if the budget or form was approved etc.

c. Authorization updates/Budget Amendments – Again, this is the same situation as above in that a standard time frame of notification is needed.

4. Minimize reimbursement turnaround time on large purchases (DDD):

Explanation – Upfront payment and reimbursement wait time creates cash flow issues for CSPs and was noted by several providers during the discussions. The general understanding of the current process is that reimbursement does not take place until the product is delivered. The workgroup recommended changing the authorization procedure/policy so that reimbursement can occur sooner thus preventing any cash flow issues.

Information Technology Recommendations

1. Improve downloadable CVS/Excel reports in FOCoS (DDD)

Explanation – It was noted that some features in FOCoS are very useful in this respect. However, it was recommended that the FOCoS IT system expand downloadable Excel/CSV reports.

2. Bulk upload capability in FOCoS (DDD)

Explanation – The workgroup recommended that the FOCoS IT system create or expand bulk upload capability. This will reduce administrative time.

3. Mobile options for FOCoS (DDD)

Explanation – The workgroup noted that mobile options used to be available in FOCoS but are no longer available. It was recommended that FOCoS pursue re-establishing these options or expanding the options to help reduce administrative time for coordinators.

4. Improve notification systems in File Zilla (state system, tracking 799 Forms) (DDD)

Explanation – The workgroup recommended that the state create a notification system that will either electronically notify providers when 799 forms are viewed, approved, or denied, or a system where consistent notification for the above is provided by DDD staff. This will reduce continual logging in and checking on if 799 forms etc. have been viewed, approved, or denied.

5. Will Therap play a role in Family Support? (DDD)

Explanation – The main recommendation with respect to this topic is that CSPs and Family Support Coordinators be invited to the table if Therap will be used in future IT solutions for the program. It's important to note that the workgroup was not sure if Therap will be a part of any future IT solution, but many had heard that it was possible.

General Communication Recommendations

Please note. The workgroup discussed that general communications was such a large and important topic that it could potentially require more thorough examination in conjunction with DDD. Below are some of the major recommendations.

1. Establish a best practice workgroup that includes service coordinators (FS Provider CSPs)

Explanation – The workgroup felt that establishing a best practice group among service coordinators could potentially help improve consistency. This could help streamline procedures for providers, reduce administrative time, and provide the DDD with more consistency from all providers thus reducing the variances in procedures across providers. This workgroup could also be a part of the best practice workgroup mentioned above.

2. Consistency in regular communications (DDD & FS Provider CSPs)

Explanation – This recommendation pertains to regular ongoing communications between the DDD and providers. This program requires efficiency in order to operate in a sustainable fashion, thus responsiveness on the part of DDD and CSPs is critical.

3. Conduct regular trainings on Family Support administration and FOCoS (DDD)

Explanation – The workgroup noted that regular training opportunities would be a good activity because both CSPs and DDD experience turnover. This could be as simple as review and process trainings that occur regularly and as needed throughout the year.

4. Provide an information briefing to the DDD on the internal control requirements that CSPs must perform and the concerns from auditors (FS Provider CSPs)

Explanation – The workgroup felt that the DDD may not fully understand the activities providers have to conduct to maintain good internal controls and address concerns from auditors. This informational briefing would have two primary functions. First, to shed light on necessary internal procedures and auditing practices, and second, to provide insight into generating ideas for reducing administrative burdens and streamlining the program.