

TRANSITION TO CONFLICT-FREE CASE MANAGEMENT

COMMUNITY IMPACT
SURVEY RESULTS

JANUARY 2019



COLORADO
Department of Health Care
Policy & Financing

NAVIGANT

INTRODUCTION

Navigant Consulting, Inc.

We are health care consultants with more than 25 years of experience working with public payers in the areas of payment system design, provider cost reporting and analysis, program evaluation, healthcare reform, and the development and financing of consumer-directed services and managed care systems.

We provide consulting services related to policy and reimbursement for home and community-based services (HCBS) services for:

- Arizona
- Colorado
- Centers for Medicare and Medicaid Services (CMS)
- Illinois
- Minnesota
- Nebraska
- North Dakota
- Texas
- Wyoming

OBJECTIVE OF THE MEETING

The goal of this meeting is to review findings from the community impact survey conducted November – December, 2018 regarding the transition to conflict-free case management.

During the meeting, we plan to accomplish the following:

1. Review state and federal requirements regarding conflict-free case management in the delivery of HCBS
2. Review conflict-free case management survey purpose and process
3. Review survey results, including trends and significant items to note

FEDERAL AND STATE REQUIREMENTS

NEW FEDERAL AND STATE REQUIREMENTS RELATED TO CASE MANAGEMENT SERVICES



Federal Regulations

In March 2014 the Centers for Medicare and Medicaid Services (CMS) released a rule, 42 CFR 441.301(c)(1)(vi), requiring the separation of case management from the direct service provision of HCBS.



State Statute

In 2017, the Colorado General Assembly passed HB17-1343, defining conflict-free case management: “Case Management services provided to a person with an intellectual and developmental disability enrolled in a home-and community-based services waiver that are provided by a case management agency that is not the same agency that provides services and supports to that person.”

CONFLICT-FREE CASE MANAGEMENT COMPLIANCE

- While HB17-1343 is specific to individuals with intellectual and developmental disabilities (I/DD), the federal regulation is applicable to all HCBS waivers.
- All individuals receiving services via HCBS waivers must be served through a system of conflict-free case management no later than June 30, 2022.

KEY TIMELINE

Date	Responsible Entity	Activity
January 1, 2018	HCPF	Publish guidance on the components of a business continuity plan
July 1, 2018	Agency	Submit a business continuity plan to HCPF based on the best option for the agency
January 7-10, 2019	HCPF	Conduct stakeholder meetings to review community impact survey results and gather additional feedback
June 30, 2019	HCPF	Complete an analysis of the adequacy of the business continuity plan
June 30, 2020	Agency	Complete necessary changes to operations required to implement the agency business continuity plan
June 30, 2021	Agency	Serve at least 25 percent of clients receiving HCBS through a system of conflict-free case management
June 30, 2022	Agency	Serve all clients receiving home and community-based services through a system of conflict-free case management

CONFLICT-FREE CASE MANAGEMENT COMMUNITY IMPACT SURVEY BACKGROUND

WHAT IS THE OBJECTIVE OF THE COMMUNITY IMPACT SURVEYS?

The Department's Goal

- To obtain conflict-free case management transition impact feedback and identify potential challenges, as stakeholders and providers adopt conflict-free case management.

Navigant's Role

- To develop two surveys, one for stakeholders and one for providers, to solicit conflict-free case management transition related feedback.

Goal of the Community Impact Survey

To gain a better understanding of stakeholder and provider transition impacts so that the Department can organize future work while complying with federal and state requirements.

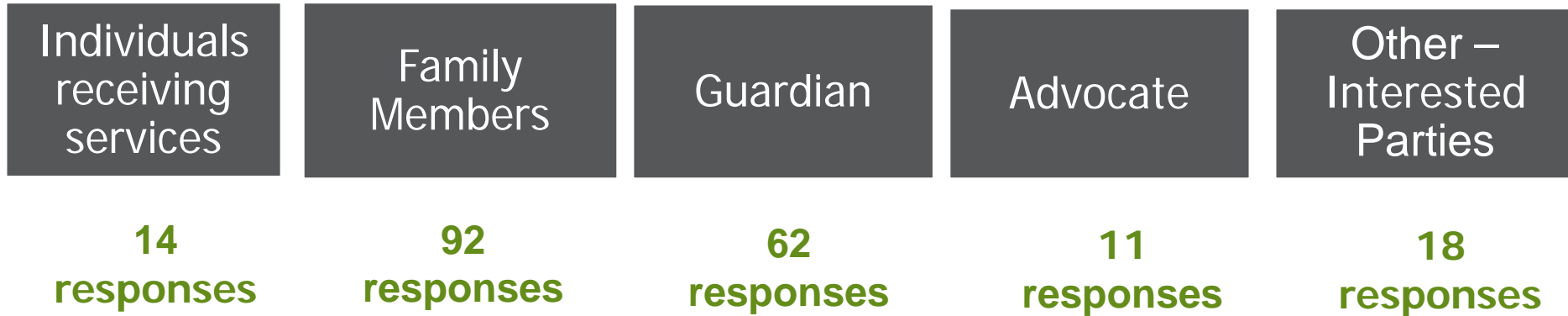
HOW WAS THE SURVEY DISTRIBUTED?

- On November 8, 2018, the Department distributed an email containing a link to a web-based survey tool using the Qualtrics survey platform.
- Two surveys were developed, one for stakeholders and families and one for providers.
- Surveys closed on December 14, 2018.

HOW WAS THE STAKEHOLDER SURVEY ORGANIZED?

- Navigant, with assistance from the Department, developed a stakeholder survey and solicited responses from the following:
 - Individuals receiving services
 - Family members
 - Guardians
 - Advocates
 - Other interested parties
- Survey was composed of 45 questions and incorporated survey logic. Stakeholders were not required to answer all questions and were given an opportunity to provide free-response feedback.

WHO RESPONDED TO THE STAKEHOLDER SURVEY?



- **197 stakeholders** responded to the survey by the end of the survey period.
- Stakeholder responses represented 19 counties in Colorado, with the following three counties most highly represented:
 - Jefferson County (25% of total responses)
 - Arapahoe County (23% of total responses)
 - Boulder County (14% of total responses)
- Stakeholder respondents represented seven (7) HCBS waiver programs

HOW WAS THE PROVIDER SURVEY ORGANIZED?

- Navigant, with assistance from the Department, developed a provider survey and solicited responses from the following:
 - Community Centered Boards (CCBs)
 - Case Management Agencies
 - Single Entry Points (SEPs)
 - Direct Service Providers
- Survey was composed of 47 questions and incorporated survey logic. Providers were not required to answer all questions and were given an opportunity to provide free-response feedback.

WHO RESPONDED TO THE PROVIDER SURVEY?

Direct Service
Providers

105
responses

Community-
Centered Boards

62
responses

Case
Management
Agencies

30
responses

Single Entry
Point Agencies

9
responses

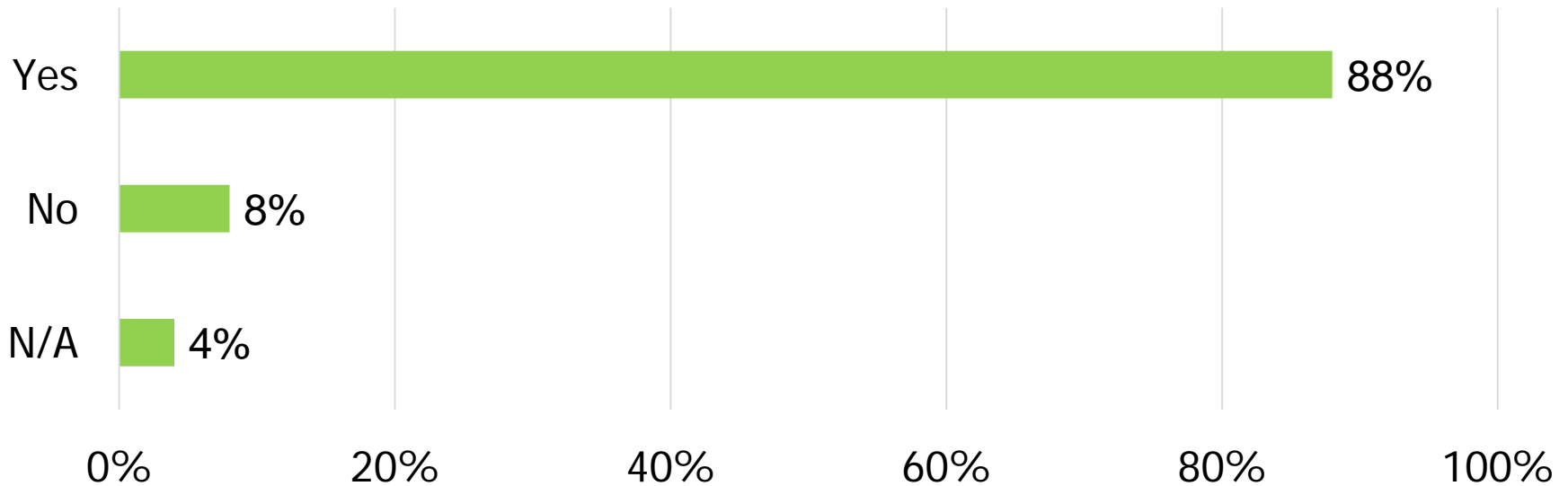
- **206 providers** responded to the survey by the end of the survey period.
- Provider responses came from agencies serving all 64 counties in Colorado, with the following four counties most highly represented:
 - Boulder County (10% of responses)
 - Broomfield County (10% of total responses)
 - Adams County (7% of total responses)
 - Denver County (6% of total responses)
- Provider respondents represented ten (10) HCBS waiver programs.

STAKEHOLDER SURVEY FINDINGS

STAKEHOLDER SURVEY FINDINGS: CONFLICT-FREE CASE MANAGEMENT AWARENESS

- The majority of stakeholders who responded to the survey affirmed understanding the concept of conflict-free case management.

Q: I understand that individuals will not be able to receive their case management and Home and Community-Based Services from the same agency. This is known as "conflict-free" case management.



STAKEHOLDER SURVEY FINDINGS: CONFLICT-FREE CASE MANAGEMENT AWARENESS

- Although survey stakeholder respondents overwhelmingly affirmed understanding of the concept of conflict-free case management, most stakeholders have not yet been affected or impacted by conflict-free case management transition.
 - **40% of individuals receiving services, family members, and guardian survey respondents neither agreed or disagreed** when posed with the question of whether they felt the **Department would address their questions or concerns** about conflict-free case management.
 - The **majority neither agreed nor disagreed** when asked whether they **currently receive the guidance and support needed from their service provider** regarding the need for conflict-free case management.
- Many individuals, guardians, and family members have yet to receive information from agencies or providers regarding conflict-free case management.
 - **24% of survey respondents** reported **receipt of notification from their agency about service provider related changes** due to conflict-free case management.

STAKEHOLDER SURVEY FINDINGS: CONFLICT-FREE CASE MANAGEMENT AWARENESS FEEDBACK

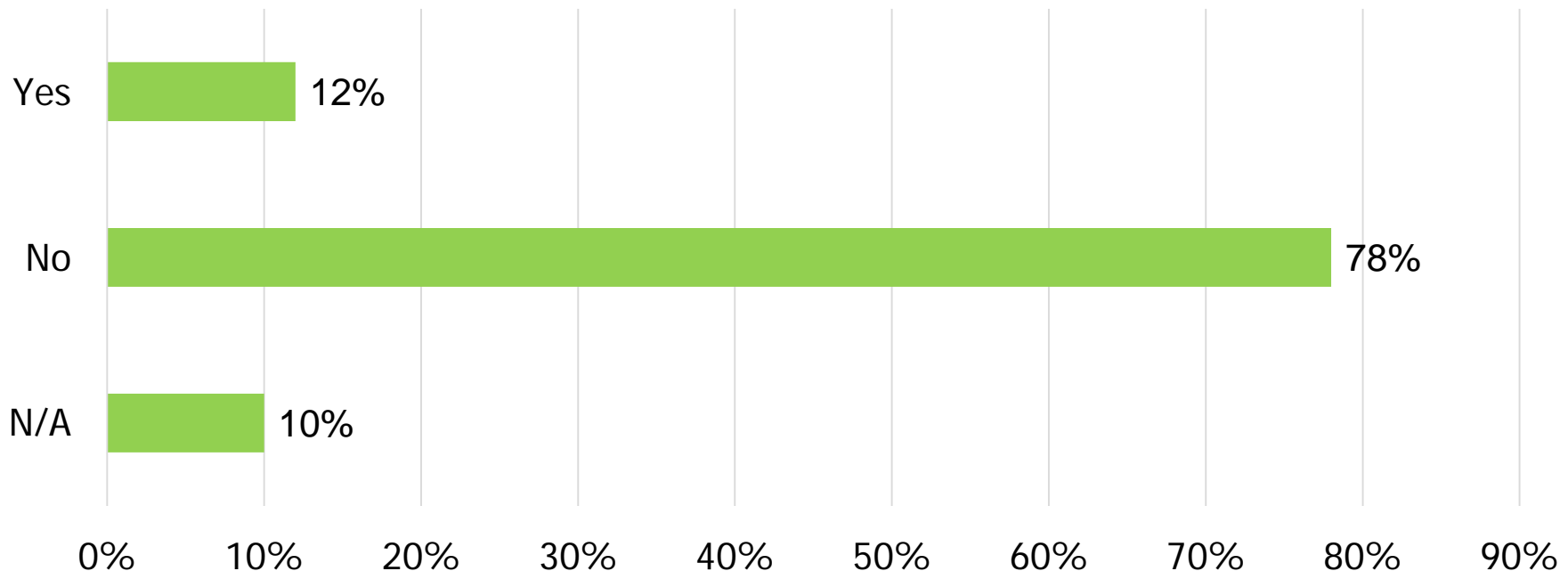
When asked about conflict-free case management transition related concerns, stakeholders continued to express a lack of awareness and confusion relating to the potential implications of conflict-free case management.

Concerns	Sample Responses
Lack of awareness	<ul style="list-style-type: none">• <i>"This is the first I have heard of this and I do not understand what the implications are"</i>• <i>"This is the first we have heard about it. Not even sure what this is."</i>• <i>"It's going to happen (or is already happening) but I don't think a service provider or HCPF has ever contacted me info."</i>
Confusion	<ul style="list-style-type: none">• <i>"This can be very confusing for family members and clients"</i>• <i>"I don't really understand what it means to us."</i>• <i>"I have no idea what to expect or how this will affect my son's services"</i>

STAKEHOLDER SURVEY FINDINGS: 2018 CONFLICT-FREE CASE MANAGEMENT TRANSITION IMPACT

- Individuals, guardians and family members** report minimal conflict-free case management related impact on their direct service or case management options.

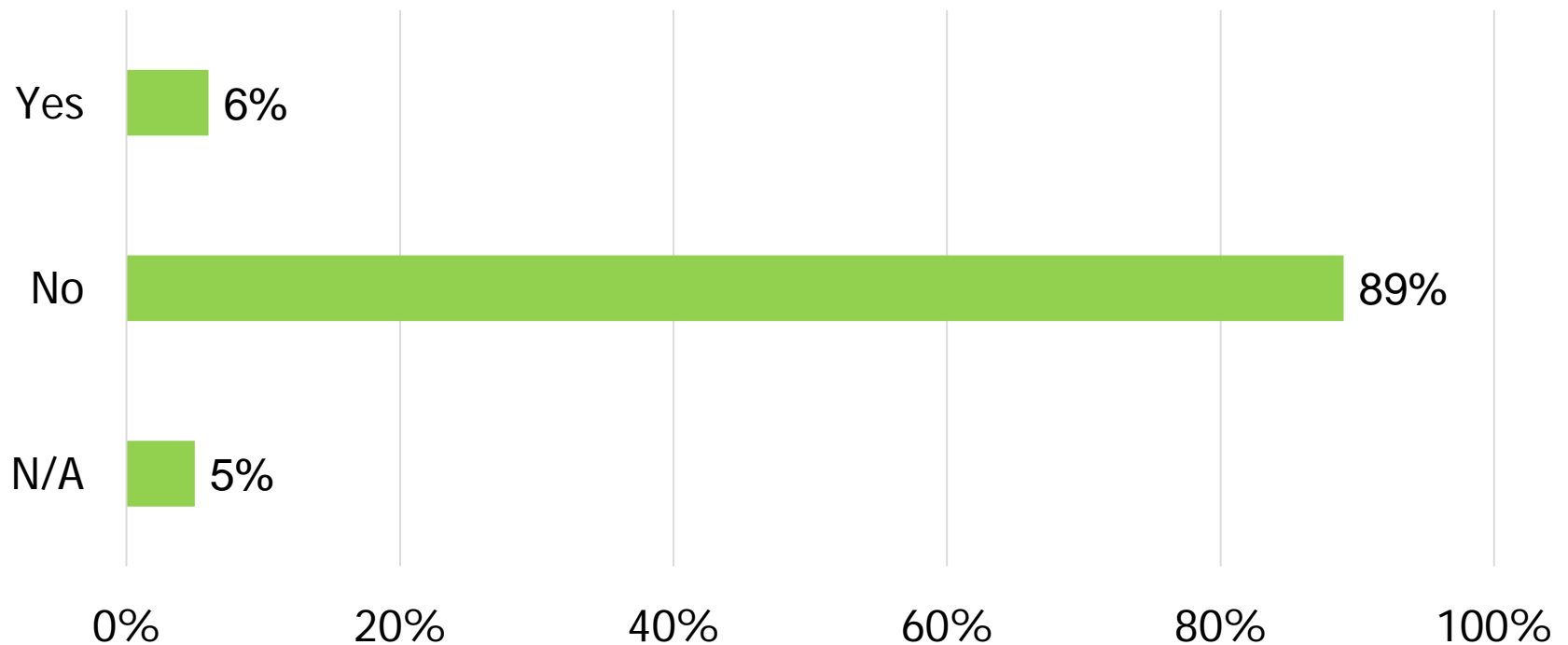
Q: In 2018, have your service options decreased or been removed due to case management related changes?



STAKEHOLDER SURVEY FINDINGS: 2018 CONFLICT-FREE CASE MANAGEMENT TRANSITION IMPACT

- The majority **of individuals receiving services, family members and guardians** did not select a new case manager in 2018.

Q: In 2018, did you choose a new case manager to help you manage your services?



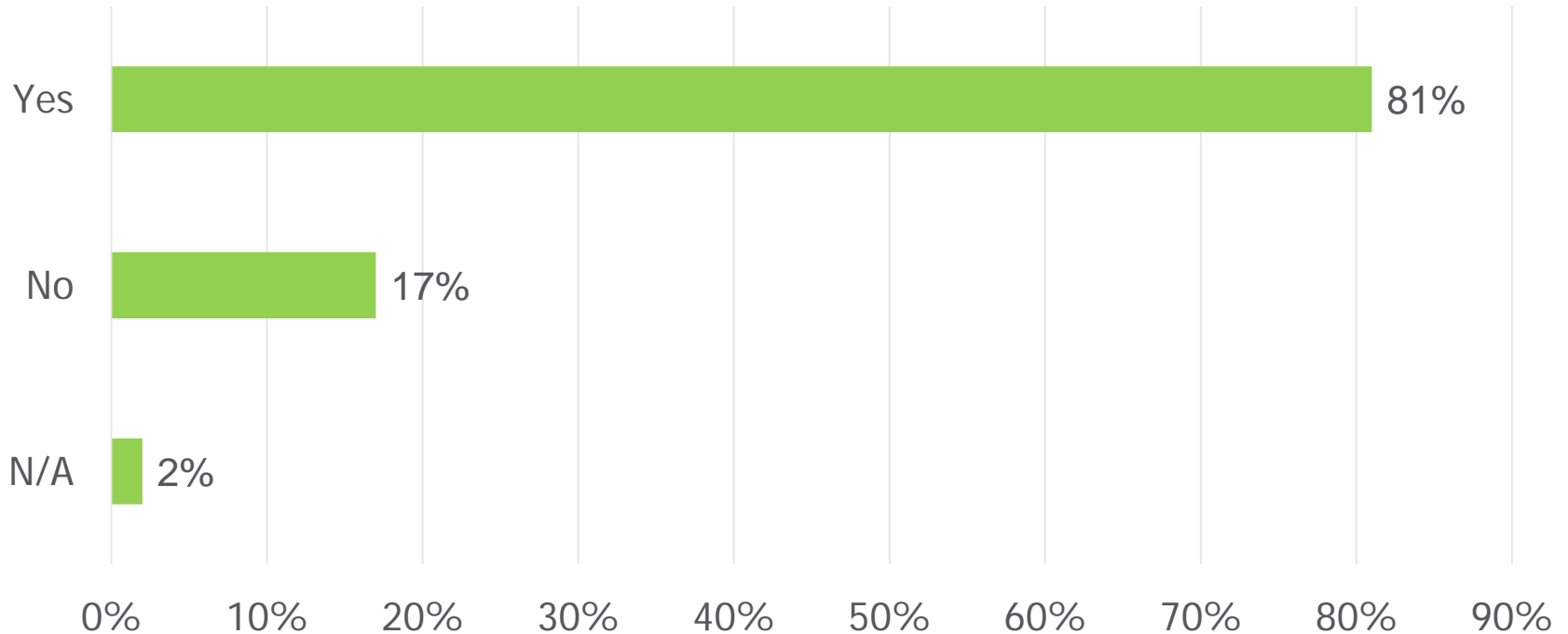
STAKEHOLDER SURVEY FINDINGS: 2018 CONFLICT-FREE CASE MANAGEMENT TRANSITION PROGRESS

- The majority of **individual receiving services, family members, and guardian** survey respondents have not yet seen conflict-free case management transition related changes affect their current services and/or quality of services.
 - **70%** reported experiencing no trouble with finding a case manager.
 - **62%** also noted no difficulties in finding an agency or provider to provide home and community based services (direct services).
 - **17%** reported choosing a new agency or provider to render HCBS in 2018.
 - **53%** reported no changes in quality as a result of conflict-free case management and another **25%** reported N/A

STAKEHOLDER SURVEY FINDINGS: GUIDANCE AND SUPPORT

The **majority of individuals receiving services, family members and guardians** reported knowing who to reach out to in the event of a problem or concern with their care.

Q: Do you know who to reach out to if you have problems or concerns with the care you are receiving?



STAKEHOLDER SURVEY FINDINGS: GUIDANCE AND SUPPORT REGARDING CONFLICT-FREE CASE MANAGEMENT CONTINUED

Advocates/other interested parties were less certain than individuals, guardians and family members about who to reach out to if they have problems or concerns with the care being delivered to individuals.

Q: I receive the guidance and support I need regarding the change to conflict-free case management (Advocate/Other Interested Parties Only)

Response	Percentage of Response
Strongly Agree	0%
Agree	10%
Neither Agree/Disagree	28%
Disagree	20%
Strongly Disagree	28%
N/A	14%
TOTAL	

STAKEHOLDER SURVEY FINDINGS: GUIDANCE AND SUPPORT CONTINUED

Despite conflict-free case management not yet affecting the majority of surveyed stakeholders, stakeholders reported feeling supported from their service provider during the transition.

Q: I receive the guidance and support I need from my service provider regarding the change to conflict-free case management.

Response	Percentage of Responses
Strongly Agree	19%
Agree	29%
Neither Agree/Disagree	29%
Disagree	9%
Strongly Disagree	10%
N/A	4%

STAKEHOLDER SURVEY FINDINGS: ADVOCATE CONCERNS

- Many advocates and other interested parties felt that individuals did not have the necessary information and/or experienced restrictions when selecting case managers and direct service options.
 - When asked whether individuals have enough information to **help choose a service provider or a case manager**, **45%** noted that they did not.
 - Additionally, **35% of advocates** responded affirmatively to whether agencies are **presenting individuals with service options from different providers**.
- Advocates also expressed a desire for increased individual choice. Some of their comments in the free responses included:
 - *“They don’t give the consumer a lot of options”*
 - *“There is only one case management agency. There are individual changes in CM but that is largely due to staff turnover, it is not done by individual choice.”*
 - *“Again, there is no other qualified provider”*

STAKEHOLDER SURVEY FINDINGS: STAKEHOLDER CONCERNS REGARDING CONFLICT-FREE CASE MANAGEMENT

All stakeholders were given the option to provide additional detail regarding their concerns about the change to conflict-free case management. The following table highlights some of the survey responses:

Concerns	Sample Responses
Disruptions/changes to services	<ul style="list-style-type: none">• <i>“That our kids will lose the opportunity to have good case management under the new strict guidelines and rules”</i>• <i>“Needing to eliminate a successful, long-term relationship”</i>
CCB-related issues	<ul style="list-style-type: none">• <i>“I disagree with the rural exemption that allows the local CCB to continue providing case management and service provision”</i>
Lack of knowledge/information regarding conflict-free case management	<ul style="list-style-type: none">• <i>“This can be very confusing for family members and clients”</i>• <i>“Lack of communication regarding this change”</i>• <i>“I have no idea what to expect or how this will affect my son’s services”</i>
Elimination of choice	<ul style="list-style-type: none">• <i>“I feel strongly this is a mistake and removes choice from us”</i>
Confusion or disagreement about conflict-free case management	<ul style="list-style-type: none">• <i>“I worry that separating service and case management for my son will result in a worsening of services, rather than an improvement”</i>

STAKEHOLDER SURVEY FINDINGS: SUPPORT FOR CONFLICT-FREE CASE MANAGEMENT IMPLEMENTATION

- Stakeholders expressed support for conflict-free case management transition and its associated upcoming changes to case management and care delivery in the free response sections:
 - *“We are anxious to participate in the available programs and feel that having conflict-free case management will contribute strongly to a more successful experience for the client and manager.”*
 - *“Insist and persist, that conflict-free case management take place, and as quickly as possible. There are many qualified and responsible service providers that can assume the responsibility from the agencies.”*
 - *“This is long overdue.”*

PROVIDER SURVEY FINDINGS

PROVIDER SURVEY FINDINGS: CONFLICT-FREE CASE MANAGEMENT AWARENESS

- **39%** of providers disagreed when asked if they had received adequate information regarding the transition to comply with conflict-free case management.

Q: Our agency has received adequate information regarding the transition to comply with conflict-free case management.

Response	Percentage of Responses
Strongly Agree	6%
Agree	27%
Neither Agree/Disagree	24%
Disagree	35%
Strongly Disagree	4%
N/A	4%

PROVIDER SURVEY FINDINGS: CONFLICT-FREE CASE MANAGEMENT AWARENESS

- Providers expressed a need for additional assistance from the Department with navigating the changes associated with conflict-free case management.
 - **75% of providers** agreed or strongly agreed that they would benefit from additional training or information during the conflict-free case management transition process.
 - **22% of providers** reported feeling supported by the Department during the transition process.
- Requests for additional technical assistance were also reflected in the free response sections:
 - *“Create additional examples of how the Department anticipates access to services will look in the future.”*
 - *“Communication and more consistent training/support for Case Management.”*
 - *“Keep providing the most up-to-date information coming from the Department.”*
 - *“Support on how to ease anxiety of the families this will impact.”*

PROVIDER SURVEY FINDINGS: INDIVIDUAL SATISFACTION AND FEEDBACK

- Consistent with stakeholder survey responses and feedback, most providers have made minimal progress in transitioning to conflict-free case management:
 - **29% of providers** have **developed a communication plan** for conflict-free case management
 - **25% of providers** have **developed specific tools to gauge individual satisfaction** as a result of conflict-free case management transition.
 - Additionally, **38% of providers** reported **establishing a formal structure to solicit conflict-free case management feedback** from various stakeholders including individuals receiving services and their family members.

PROVIDER SURVEY FINDINGS: CONFLICT-FREE CASE MANAGEMENT IMPACT

- **20% of providers** disagreed with the assertion that participants will experience gaps in care due to the transition process to comply with conflict-free case management.

Q: Participants will experience gaps in care due to the transition process to comply with conflict-free case management.

Response	Percentage of Responses
Strongly Agree	17%
Agree	24%
Neither Agree/Disagree	33%
Disagree	12%
Strongly Disagree	8%
N/A	6%
TOTAL	

PROVIDER SURVEY FINDINGS: STAFFING

- Providers estimate that transition will impact their staffing but did not provide specific examples
 - Additionally, the majority of providers indicated no plans to expand services to new areas to recruit and hire new employees. **22% of providers** expressed interest in **expanding to new areas**.
- CCB survey respondents noted that conflict-free case management transition has not yet affected case managers rendering services for agencies under conflict.
 - CCBs were split with **36% of agencies reporting yes** to having sufficient staff to ensure continuation of care during and after conflict-free case management transition and **30% reporting no**.
 - **6% of CCB survey respondents** noted being aware of employees who **transitioned from an agency and are now working with a new provider** due to conflict-free case management.

PROVIDER SURVEY FINDINGS: FINANCIAL IMPACT

- Providers expect to be impacted financially by conflict-free case management. However, providers were unsure as to the full financial implications of conflict-free case management.
 - **59% of providers** reported **anticipating financial changes** due to the transition to conflict-free case management.
 - The **majority of providers** have yet to **develop financial projections** for the post-transition period. **73% of providers** reported either **not developing projections or selected N/A** when asked about their plans. For those who elected to perform financial projections, **19% of providers project a loss in revenue** due to conflict-free case management.

PROVIDER SURVEY FINDINGS: PROVIDER CONCERNS REGARDING CONFLICT-FREE CASE MANAGEMENT

- All providers were given the option to provide additional detail regarding the hurdles remaining for agency implementation of conflict-free case management. The following table highlights some of the survey responses:

Concerns	Sample Responses
Future uncertainty	<i>"What we need to know is how this will actually work in our community. How can we analyze and give you feedback on an unknown?"</i>
Reduction in choice	<i>"We do not believe that the case management arm of our CCB can survive as an independent entity. This leads to lack of choice for individuals."</i>
Funding	<i>"In order for the transition to go smoothly and for case managers to be able to serve clients regardless of where they are located, CCB's would need more funding to accommodate this and case managers need to be paid more."</i>

PROVIDER SURVEY FINDINGS: DEPARTMENT SUPPORT

- All providers were asked how the Department could better support providers and agencies during transition. The following table highlights some of the survey responses:

Concerns	Sample Responses
Case management reimbursement	<ul style="list-style-type: none">• <i>“Determine qualifications for case management agencies and clarify future case management obligations and reimbursement so that CCB’s can determine the direction of their future services.”</i>
Additional outreach	<ul style="list-style-type: none">• <i>“More guidance and clarity on the redefined process for dealing with current internal conflict.”</i>• <i>“Communication and perhaps more training for case management.”</i>• <i>“Education on rules and regulation, training, and monitoring.”</i>
Rural Exception	<ul style="list-style-type: none">• <i>“Extend the rural exception as long as possible, request permission for individuals to choose to receive services and case management from the same agency.”</i>

PROVIDER SURVEY FINDINGS: SUPPORT FOR CONFLICT-FREE CASE MANAGEMENT IMPLEMENTATION

- Overall a significant portion of providers agreed that conflict-free case management implementation would positively affect individuals. Providers continually expressed enthusiasm for conflict-free case management implementation and most importantly were optimistic that this could potentially improve individual choice and care delivery in the free response sections:
 - *“The move to conflict-free case management hopefully will provide Medicaid recipients with a better array of choices for service providers. There needs to be a better referral process than is currently in place. Training for case managers must ensure that case managers provide real choice to recipients.”*
 - *“No hurdles, we can not wait for this!”*
 - *“I do not believe there are any hurdles to implementing conflict-free case management.”*

NEXT STEPS

NEXT STEPS FOR THE DEPARTMENT



Continue to review and assess responses received from stakeholders and providers from the survey.



Complete a cost analysis on the potential financial impact of conflict-free case management.



Review business continuity plans to assist agencies in determining readiness for the transition to conflict-free case management



Continue outreach efforts to all stakeholders with information regarding upcoming conflict-free case management related updates.

STAKEHOLDER MEETING SCHEDULE REGARDING SURVEYS

City	Date	Time
Greeley	January 7, 2019	Provider – 9:30 am - 11:30 am Individuals and Families – 1:00 pm – 3:00 pm
Pueblo	January 8, 2019	Provider – 9:00 am - 11:00 am Individuals and Families – 1:00 pm – 3:00 pm
Denver	January 9, 2019	Provider – 9:00 am - 11:00 am Individuals and Families – 1:00 pm – 3:00 pm
Grand Junction	January 10, 2019	Provider – 9:30 am - 11:30 am Individuals and Families – 2:00 pm – 4:00 pm
Webinars	January 16, 2019	Provider – 11:00 am - 1:00 pm Individuals and Families – 4:00 pm – 6:00 pm

QUESTIONS AND ANSWERS
