

FMS Provider Responses to PDPPC Stakeholder Questions

The following responses were submitted by each Financial Management Service (FMS) vendor in response to questions received from the Participant Directed Programs Policy Collaborative (PDPPC). If you have additional questions or need further information, please contact the vendors directly. The contact information can be found at the end of this document.

1. What health insurance coverage is offered to attendants under the Agency with Choice Model?

ACES\$ The health insurance plan options available as well as the corresponding costs to the Clients and Attendants are outlined below.

As with all of our information, if you have any questions, please do not hesitate to contact us at (844) 776 – 7595 to speak with someone directly.

Health Insurance Provider: Allied Benefit Systems

<u>PLAN</u>	<u>TOTAL MONTHLY COST</u>	<u>CLIENT MONTHLY COST</u>	<u>ATTENDANT MONTHLY COST</u>
Employee only	\$432.78	\$342.78	\$90.00
Employee + Spouse	\$1,081.94	\$342.78	\$739.16
Employee + Child	\$865.55	\$342.78	\$522.77
Family	\$1,514.72	\$342.78	\$1,171.94

Morningstar Under the Agency with Choice model, all employees who work 30 hours per week are eligible for health insurance. All insurance is with Cigna. The ACA compliant health

insurance coverage that includes hospitalization is offered for a total cost of \$373.95 per month. The employee is responsible for \$90.00 per month. The employees' contribution will be deducted from their paycheck over the two pay periods in the month. The balance of \$283.95 per employee is billed to the client's allocation. Please contact Morning Star for additional information. Dependent coverage is available as well. The cost of dependent coverage will be paid by the attendant. It is important that clients know that if Morning Star offers their employees coverage, the employee can refuse coverage. If an employee refuses Morning Star's coverage it may affect their eligibility or payments for other options including the Colorado health exchange.

Morning Star will split the cost of insurance if an attendant works for multiple clients based on percentage of hours worked with each client. This will be determined on a monthly basis.

PPL

PPL provides worker's compensation benefits to all employees at very competitive rates, with no out of pocket cost to you. In addition, we offer health insurance to employees who qualify per the Affordable Care Act and make this coverage available to family members, should the employee choose to purchase.

2. If the Fiscal Employer Agent (F/EA) model is selected, can my employees still buy into the FMS' health coverage if they choose to?

ACES\$

Yes, the employee may still purchase health coverage through ACES\$ if the Client chooses the F/EA model. There is no cost to the Client; the cost will come out of the Attendant's take home pay.

Morningstar

No. Morning Star is considered the Employer of Record under the Agency with Choice model and a large employer; therefore we are mandated to offer health insurance under the Affordable Care Act. Under the F/EA model the client is the employer and because they are a small employer, they are not required to offer health insurance.

Their employees are not eligible for Morning Star's health insurance under the F/EA model since Morning Star is the payroll agent not the employer.

PPL PPL offers health insurance to qualifying employees in the Agency with Choice program. We feel this best supports choice by allowing clients who choose F/EA to avoid having a large portion of their allocation go toward health insurance premiums.

3. In each model who is responsible for providing accommodations to disabled employees?

ACES\$ ACES\$ is happy to answer this question however, we would like further clarification on the types of accommodations needed or if there is a particular area of concern. We welcome the opportunity to discuss this further with any stakeholder, Client or Attendant.

Morningstar Under the Agency with Choice model, Morning Star is the employer and is responsible for ADA compliance. Under the F/EA model, the client/employer is exempt due to the small number of employees.

PPL PPL has Program Support Specialists assigned to each area of the State who personally work with clients to support them in the management of the program. PPL has also created accessible and easy to use timesheets and employee applications that are designed with assistive technology in mind. Today, we have three ways that employees and clients can submit and approve timesheets and soon we will offer a mobile application (app) that will provide another means to do this.

4. Please provide a summary of the "rules" and restrictions the FMS has that apply to each model.

ACES\$

For both models, goods and services will only be reimbursed for those items that are approved within the program and are on the approved spending plan.

Both FE/A and AwC Models:

- Time sheets must be submitted on time and signed off on by the client prior to payroll being issued. If timesheets are submitted late or need to be corrected and miss the payroll deadline we will issue payment through our supplemental payroll.
- Attendant's wages do not exceed established wage rate maximums for CDASS.
- Attendant's hourly wage does not exceed the rate established by the Department and negotiated between the Attendant and the Client or Authorized Representative (AR).
- Payments are generated based upon the Client's Individual Allocation as per the Client/AR.
- No payments are disbursed once the yearly Individual Allocation is spent, even if timesheets are submitted.
- Payroll will halt any reimbursement to Attendants when a Client is no longer eligible for CDASS or when the Client's Allocation has been depleted. Reimbursement for Attendant Care under these scenarios becomes the responsibility of the Client.
- If a family member serves as an Attendant, this information is captured in our payroll system. Our system documents that the family member will be employed by ACES\$ and be supervised by the Client/AR.
- ACES\$ will not reimburse a family member and/or legal guardian for performing Personal Care, Homemaker and/or Health Maintenance Activities as an Attendant for more than forty (40) hours of CDASS in a seven day period from 12:00 am on Sunday to 11:59 pm on Saturday.

Variations between AwC and F/EA:

There are certain FMS forms that are relevant to the Attendant. These forms are explained to the Client in the F/EA model. In the AwC model, ACES\$ would take on the responsibility for addressing these directly with the Attendant and the Client.

- For each Attendant hired by the Client, an agreement between the Client and ACES\$ and an agreement between the Client and the Attendant must be completed. This agreement is located within the Client Enrollment Packet and outlines the roles, rights and responsibilities of all parties.
- All Employee forms must be filled out and filed with ACES\$.
- Under AwC health insurance must be offered to the Attendant by the FMS provider.
- Both Attendant and family member wages must be commensurate with the level of skill required for the task and justified on the Attendant Support Management Plan (ASMP). While the Attendant's skill level is typically determined by the Client with assistance by the Case Manager in the F/EA model, ACES\$ will participate in this role of assessing skill level needs with the Case Manager as needed under the AwC model.

Morningstar The two different options afford employers and employees different opportunities. Under the Agency with Choice model the client or Authorized Representative is the managing employer or co-employer. Because Morning Star is the Employer of Record, all workers compensation, liability insurance and unemployment insurance are provided by Morning Star. Under Agency with Choice, Morning Star is required to offer employees medical insurance. We have chosen what we believe is the most cost effective, affordable option that meets the requirements of the ACA. We have options for less coverage if desired.

The Fiscal Employer Agent (F/EA) option is different in that the client or Authorized Representative is the employer. Morning Star provides all of the paperwork needed to become an employer as well as customer service to assist with filling out the forms.

We are your payroll agent under the F/EA model. One advantage to this model is the exemptions for family members working for the client/employer. If you are the parent, spouse or child under 21 of the Employer, you are exempt from FICA (Social Security and Medicare) taxes, FUTA and SUTA. This is not an elective option under this model. If the client is the employer and the employee is a parent, spouse or child under 21 years old the exemptions are a requirement of the IRS. Under the F/EA model, the employer is not required to offer insurance.

Under either model, the managing employer or employer choose the employee, supervise and train the employee. Morning Star does background checks and other employee verification. The managing employer or employer checks the employee's references.

PPL PPL puts no specific rules or restrictions on either model, allowing the Client to direct his or her own services as s/he chooses. PPL adheres to the program rules laid out by the State, as well as rules established through State and Federal law.

5. What is your company's customer base in other states?

ACES\$ ACES\$ currently works with 7,500 consumers and over 16,000 attendants in Illinois and Pennsylvania.

Morningstar Morning Star is a provider of self-directed services in Utah, Oklahoma, Tennessee and Ohio. We have provided consumer directed services in Minnesota under Orion ISO a related company since 1999. In Oklahoma, Tennessee and Ohio we are the sole financial management service for the programs with which we contract. In Utah, we are one of three. In Minnesota, we are one of 13 fiscal support entities.

PPL

PPL provides financial management and related supports for self-directed programs in 24 States. We provide our services to over 60,000 clients and 68,000 attendants.

6. What are your company's customer satisfaction ratings (from an independent audit or survey) from other states?

ACES\$

ACES\$ offers superior customer service to its Clients and their Attendants. We consistently receive high marks on our consumer satisfaction survey for our service provision. The survey evaluates a number of FMS service areas from the Client's perspective such as how effective staff is in assisting them during the initial enrollment process, what their experience is like submitting timesheets, how easy it is to get assistance from ACES\$ staff, how effective staff are in solving issues when contacted etc. The results are overwhelmingly positive.

We have provided our survey results below for 2014 would be happy to share results of previous surveys upon request.

2014 Survey Results

Survey Question	Overall Satisfaction/Effective Rate				
	1 Not Effective	2 Somewhat Effective	3 Effective	4 Quite Effective	5 Very Effective
How effective was ACES\$ staff in assisting you during the Initial Enrollment process?	5.4%	7.1%	25.0%	21.0%	41.5%

How would you rate your experience in submitting timesheets to ACES\$?	2.7%	7.7%	16.5%	23.2%	50.4%
How would you rate your experience in your Personal Support Worker receiving their checks and/or direct deposits?	1.3%	4.0%	17.4%	19.2%	58.0%
Did you know ACES\$ now offers online timesheet submission and budget management on their website: www.mycil.org	Yes: 93.8%		No: 6.2%		
If you answered yes to question #4, then how would you rate your experience using our online timesheet portal?	7.6%	6.6%	15.7%	21.8%	48.2%
How would you rate your experience in communicating with ACES\$ staff?	4.5%	9.9%	21.2%	20.7%	43.7%

	How would you rate the effectiveness of ACES\$ resolving any issues you may have had?	4.1%	10.1%	20.6%	21.1%	44.0%
	How would you rate your overall satisfaction with ACES\$?	1.3%	6.7%	15.6%	24.6%	51.8%
Morningstar	Orion ISO achieved 99% in 2014 in Minnesota and Morning Star achieved 99% in late 2013 in Tennessee. We achieved 94.5% in Utah in 2014. We are scheduled to conduct satisfaction surveys in Ohio in January 2015. All of these surveys have been conducted by Morning Star. Clients submit their surveys anonymously. In 2012, the Division of Services for People with Disabilities in Utah conducted an independent survey of its 3 providers. Morning Star ranked first with an overall satisfaction score of 97.6%.					
PPL	<p>PPL takes great pride in conducting customer satisfaction surveys for a wide range of our programs, to ensure the individuals accessing our services are the center of our approach. These surveys are intended to drive constant improvements in quality, technology and customer service.</p> <p>Our latest survey in Colorado, conducted by an independent outside party, showed that approximately 96% of the clients responding were happy with the payroll and tax services provided by PPL and most were likely to recommend the program to other eligible consumers.</p>					

7. What is your company’s BBB rating? If none, why haven’t you joined or asked to be listed?

ACES\$	ACES\$ has become a member of the BBB in Denver and believe in the 8 levels of Trust promoted throughout as a practice. We are a member in good standing.
Morningstar	Morning Star Financial Services, LLC is not listed with the Better Business Bureau.
PPL	PPL has a BBB rating of A-.

8. How responsive are you to customer complaints? Please provide stats on number of complaints, number resolved to customer satisfaction, length of time to resolution.

ACES\$	We rarely have customer complaints. Any Client or Attendant complaints or issues are immediately addressed. Our staff is readily accessible to answer questions and to work with the Attendants, Clients or their Authorized Representatives to address and rectify the issue. We have provided information in a chart regarding our satisfaction rates as part of our answer to question number 9.
Morningstar	Morning Star is committed to providing immediate resolution to issues as they arise and will resolve complaints in 1-2 days. Morning Star tracks complaints as those issues where a Morning Star supervisor chose to intervene or was contacted by a client. Morning Star maintains a log of all customer feedback and complaints and reviews the log for quality improvements on a regular basis.
PPL	PPL believes a well-designed complaints and grievance process is critical to the success of the program and strives to respond to all time sensitive items as quickly as possible. Our management team reviews all complaints monthly to ensure we are making any necessary process improvements to better serve our customers.

9. Has your company ever been cited for failing to fulfill their duties or responsibilities?

ACES\$	We have never been cited for failing to do our duties or responsibilities.
Morningstar	No. Morning Star Financial Services has an impeccable record. For example, on a recent state audit in Tennessee, Morning Star was 99.5% compliant with the quality standards for personnel and training.
PPL	We have never been cited for failing to fulfill our contractual responsibilities.

10. Has your company ever missed a payroll deadline?

ACES\$	ACES\$ has never missed a payroll deadline.
Morningstar	No. Morning Star has never missed a payroll deadline.
PPL	Paying CDASS employees accurately and on time is our number one priority. PPL has always been in compliance with Colorado contract payroll requirements.

11. Has your company been terminated or not had your contract renewed in another state for doing a poor job?

ACES\$	We have never been terminated for poor performance. We were previously an FMS vendor for waiver services in Pennsylvania. This contract was neither terminated nor renewed, the structure of FMS services in the state was revised, and a new RFP was issued. ACES\$ did not win the new contract. After the new contract was awarded our organization was contracted to assist the new provider in transferring over all clients from their previous FMS vendor to the new vendor. Prior to this there were over 20 FMS providers.
---------------	---

Morningstar	No. Morning Star has not had a contract terminated or not renewed.
PPL	PPL has never had a contract terminated or not renewed for doing a poor job. We have had two contracts not renewed due to lack of funding from the state and in one case we mutually agreed to a termination of a contract. In all three cases PPL continues to provide financial management services in the state, having been retained by the state's Medicaid agency or brought back by program agencies and managed care organizations.
12. If a worker's comp claim is filed, how will it affect my "experience mod" under each model?	
ACES\$	The cost of a claim will be passed on to the client under either model. Under both models the experience modification is not affected if there is a claim. Under the F/EA model, the premium threshold is not high enough for an e-mod to be assigned.
Morningstar	If you are with Agency with Choice, the worker's compensation is held by Morning Star and so you do not have your own experience mod; the experience mod is related to the total of all claims billed against Morning Star. If you are using the F/EA model, the workers compensation experience modification may also be affected. In both models, the experience mod depends on the significance and duration of claims. Morning Star is new in the state of Colorado and therefore has been assigned a higher worker's compensation rate.
PPL	PPL is able to leverage its national presence and scale to purchase cost effective worker's compensation for our clients in either model. Workers compensation insurance rates are impacted by claim activity, however in either model the impact would be the same. A client in either model can promote lower cost by exposing their

workers to additional training.

13. What is your hiring process? Length of application? Processing time?

ACES\$

As long as the client is fully enrolled in the program, the processing time is quick and efficient. The duration depends on whether or not the Client has candidates for the position in mind. The application is 4 pages but an applicant with a resume can attach that in lieu of filling out the employment history. Once ACES\$ has a completed application we will perform a background check. The processing time for background checks is one business day and may be less.

Morningstar

Morning Star will provide employee packets by mail, email and on our website. Employers or managing employers can also request to use our on-line employer and employee packet submission process. We are eager to assist employers and employees with filling out the forms. Once Morning Star receives a completed packet, we will start processing the employee packet within two days. Once the background study and all of the employee forms are processed, Morning Star will issue the employer a "good to go" letter by mail or email. The entire process will take no longer than 1 week once a complete packet is received.

If the employee packet is for a new employer, the new employer paperwork must also be completed and a current service authorization obtained prior to issuing the "good to go" letter to the employer.

PPL

PPL has created a method to expedite the process for an existing client to smoothly transition from the Agency with Choice model to the Fiscal Employer Agent model. We are able to pre-populate the employer and employee paperwork for all existing Clients' and employees' existing demographic information, making the transition exceptionally fast and easy. PPL processes standard employment applications within three days of

receipt and can expedite paperwork, if an urgent health and safety need exists.

14. What is the grievance process for each FMS?

ACES\$

Although no one has ever filed a grievance with ACES\$, our process is as follows: all grievances should be submitted in writing to the ACES\$ Colorado Program Director. Its receipt is acknowledged within 2 business days to the Client submitting the grievance. The Colorado Program Director (or designee) will notify the Client of action being taken on the grievance within 5 working days of the grievance acknowledgement. If a Client is not satisfied with the Program Director (or designee's response) they may grieve the resolution. The grievance is then presented in writing to the ACES\$ Chief Executive Officer (CEO) within 5 working days of the Program Director (or designee) decision. The Chief Executive Officer will respond within 5 working days. If the Client is not satisfied with the response of the CEO, he/she may present the grievance in writing to the Executive Committee of the Board of Directors. The Executive Committee will then determine if the grievance is appropriate to be heard before the Board. If the Executive Committee rejects the grievance, the resolution to the issue remains with the decision pronounced by the last supervisor involved. If the Executive Committee decides that the grievance is appropriate to be heard before the Board, the Executive Committee will select a hearing date and inform the Client involved of such date. Action taken at this level constitutes the final decision of ACES\$.

Morningstar

Morning Star Financial Services has not had a grievance filed against it. If clients wish to file a grievance, the first step is to let your Morning Star Program Administrator know immediately.

Program Administrator, Rebecca Sturdevant, Program Administrator 844-450-5444, or rsturdevant@morningstarfs.com

	<p>If the client is not satisfied that the grievance has been addressed, the client may choose to contact any of the following individuals:</p> <ul style="list-style-type: none"> • Chief Operating Officer, Cheryl Vennerstrom at 612-239-3768, cvennerstrom@morninstarfs.com • Chief Financial Officer Toni Thulen at 763-450-3780, tthulen@morningstarfs.com <p>Any of these individuals will respond to your grievance as soon as possible or within one business day and will work with you to help resolve the situation.</p>
PPL	Answer pending
15. Is your website accessible?	
ACES\$	<p>Our website meets Section 508 compliance regulations. We have built in a text resizer as well as accessibility to the site through a variety of devices. The site works well with or without images. While there is no uniformly accepted validation of accessibility, we pass multiple online accessibility tests with very high ratings. The Google top-ranked (noncommercial) website for section 508 automated testing is http://wave.webaim.org We welcome clients and stakeholders to check our site www.mycil.org with their testing tool. Our site generates zero accessibility barriers or errors.</p>
Morningstar	Yes. We have tested our website and have found it in conformance with 508 compliance regulations.
PPL	Answer pending

16. What is the contact information for each vendor?

ACES\$	Cmorrison@mycil.org or 1-844-776-7595
Morningstar	Ms-cotransition@morningstarfs.com or 1-844-450-5444
PPL	jdmartinez@pcgus.com or 1-888-752-8250