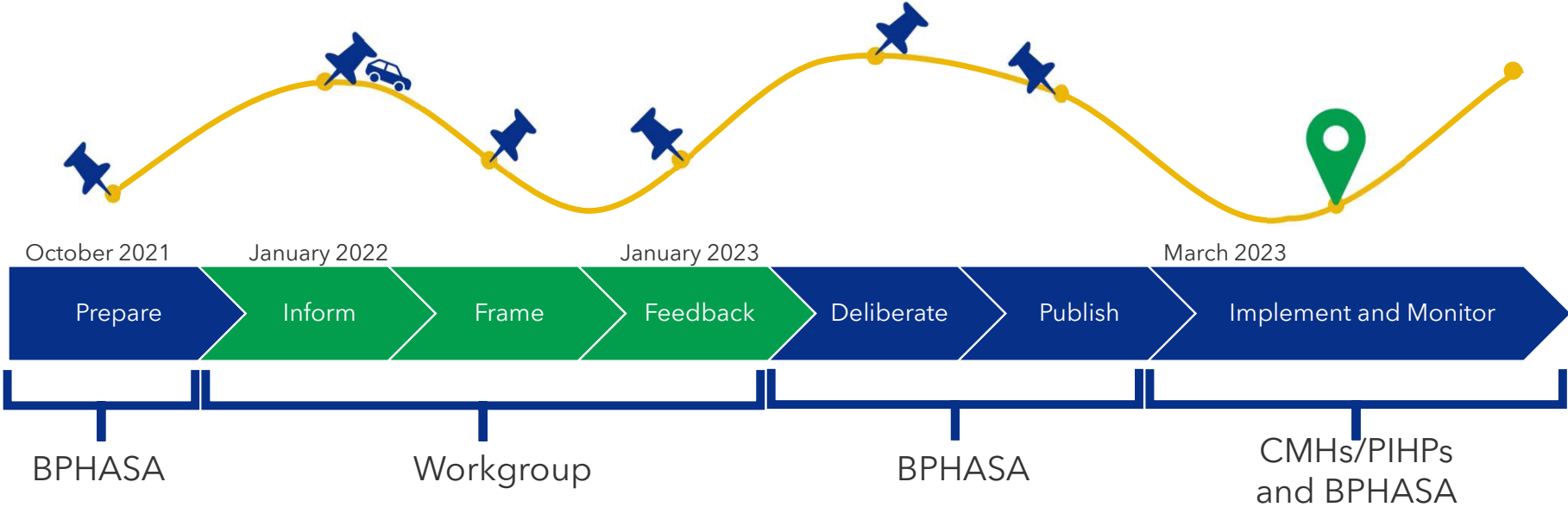


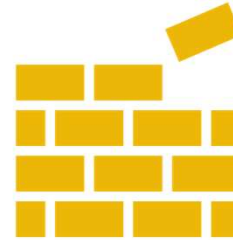
Conflict-Free Access and Planning Workgroup



Journey



What is a Firewall?



"Entities that evaluate eligibility or provide case management services cannot...have a financial interest in any entity paid to provide care to the individual."*

Provider Organization A



Provider Organization B



Firewall

*CMS COI in Medicaid Authorities Training (reference to 1915(i) State Plan Requirements), 2016

Use of Safeguards



Per the strictest interpretation of CMS requirements, Safeguards alone are not a compliant state-wide approach.

- Safeguards are only allowed, as an exception, if a region has only one willing and qualified provider.
- The State will decide whether to allow regional exceptions to the rule.
- Best practices which put the person at the center of decision making should be continued and improved upon, but they cannot make the State compliant with CFA&P.



Funding Stream

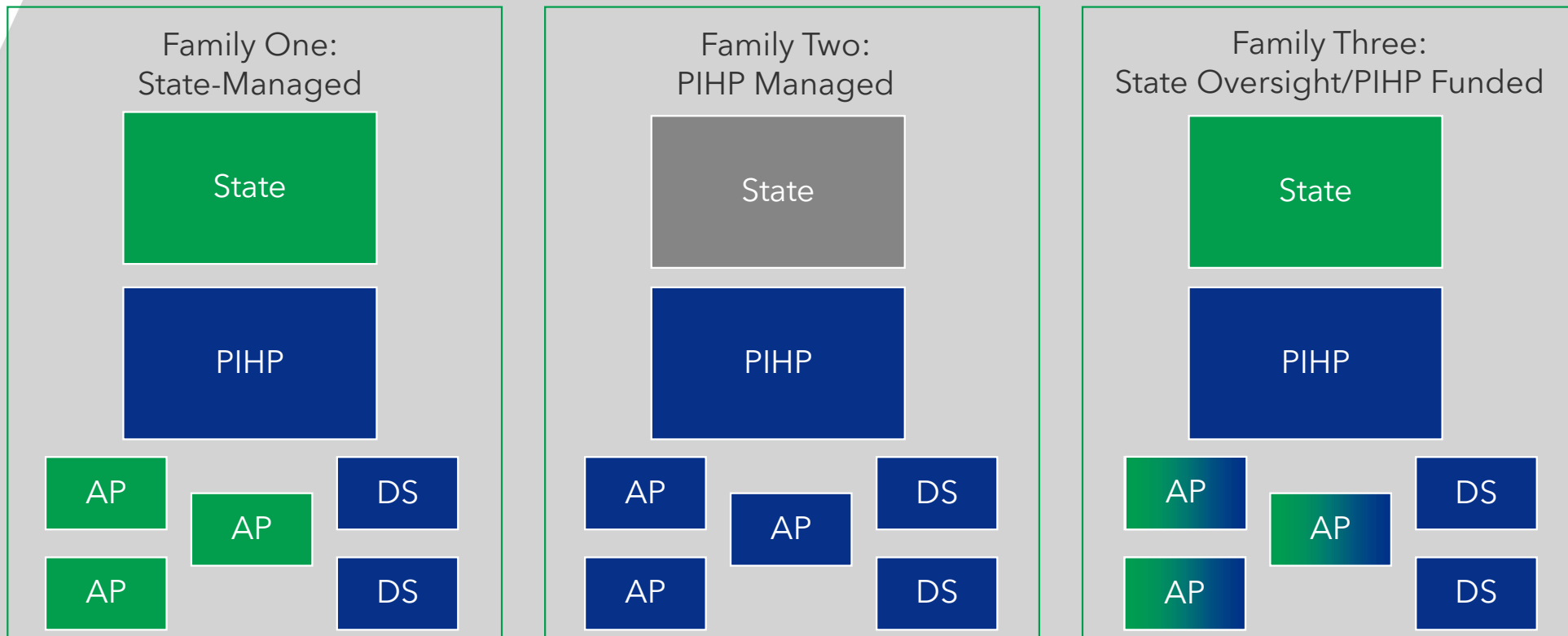


Oversight System

Sample Options



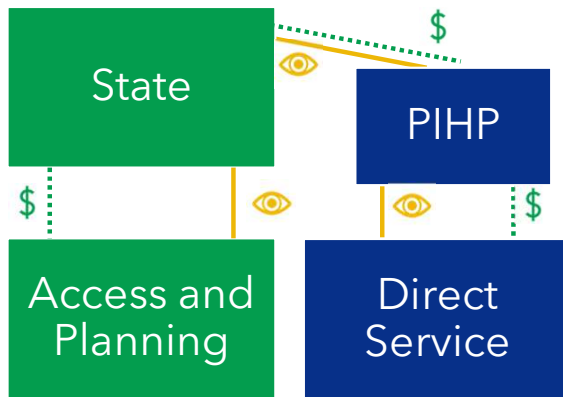
Sample Option "Families"



Sample Option Families

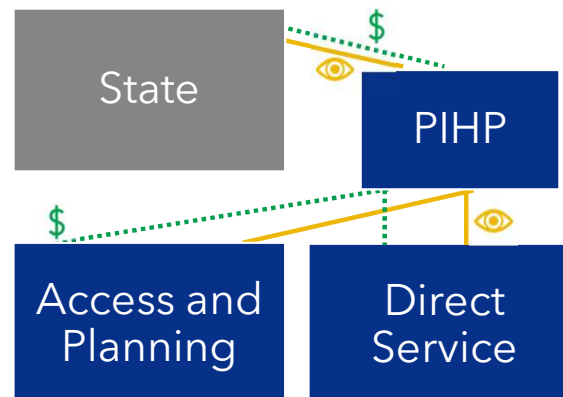
Sample option families are not suggested approaches, they are intended for workgroup discussion. Sample options are high level and only include funding and oversight processes.

Family One



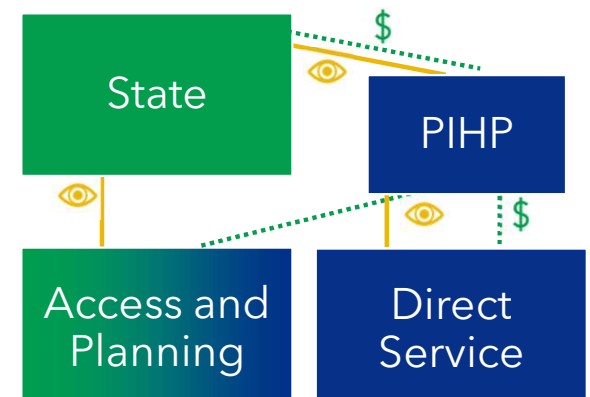
In this family, the State oversees and funds access/planning providers. Oversight and funding of direct service providers is delegated.

Family Two



In this family, oversight and funding is delegated to the PIHPs for both access/planning and direct service providers.

Family Three

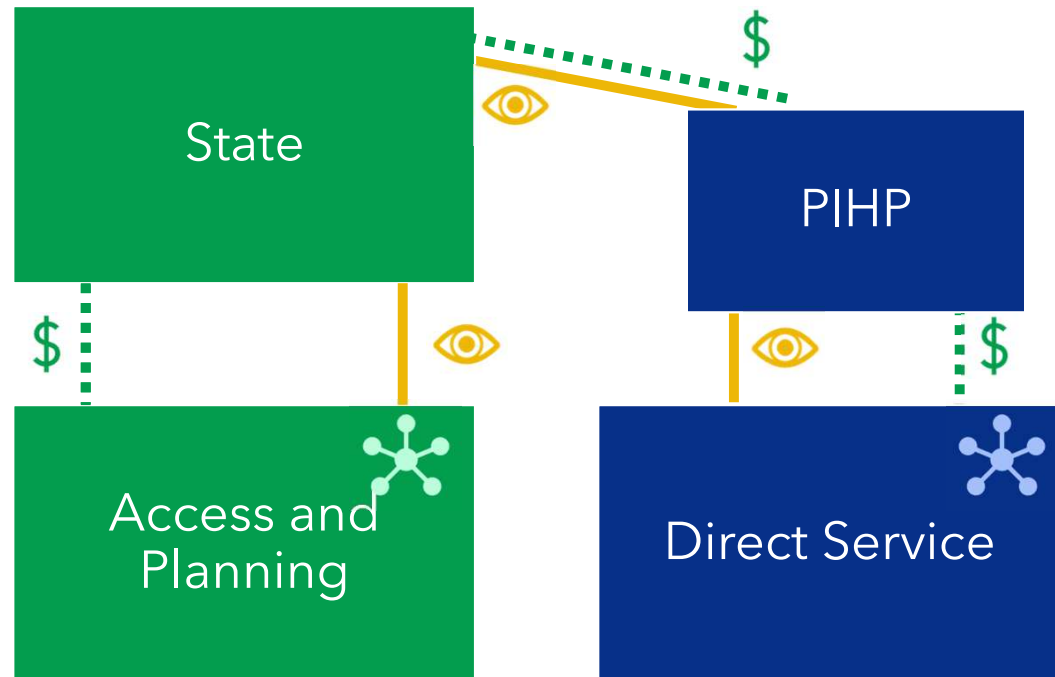


In this family, funding of both access/planning and direct services providers is delegated to the PIHPs. Oversight is shared, with the State overseeing access/planning and the PIHPs overseeing direct service.

Family One: State-Managed

Change From Current System

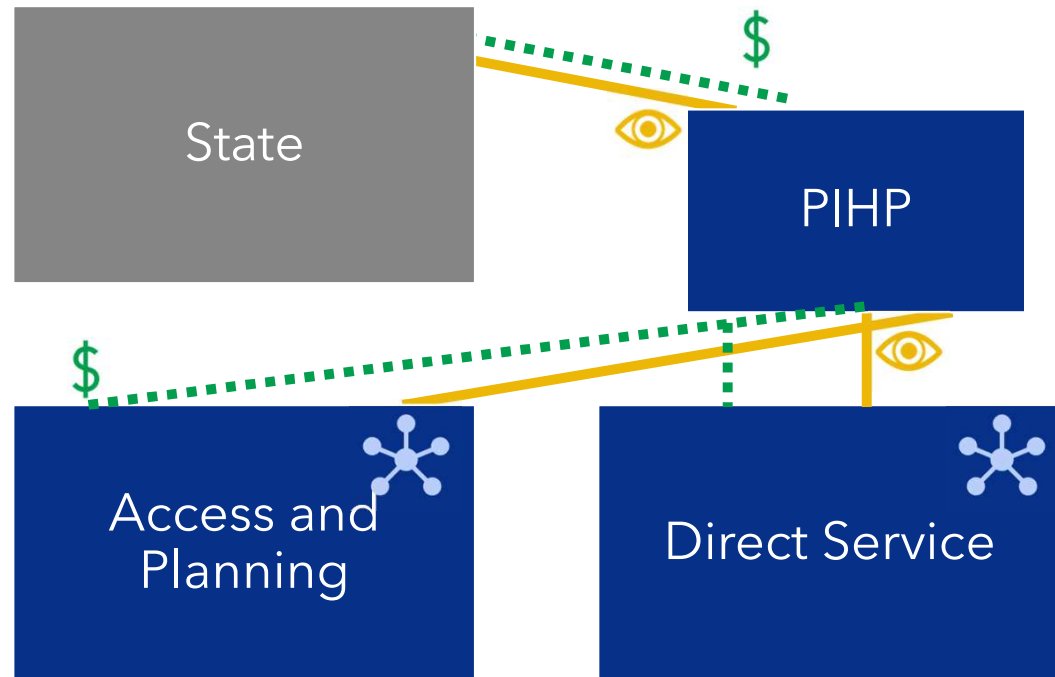
- System manages DS providers as it currently does.
- State manages a separate group of AP providers.
- AP providers are not overseen or funded by PIHPs.
- AP provider organizations cannot also provide direct services.



Family Two: PIHP Managed

Change From Current System

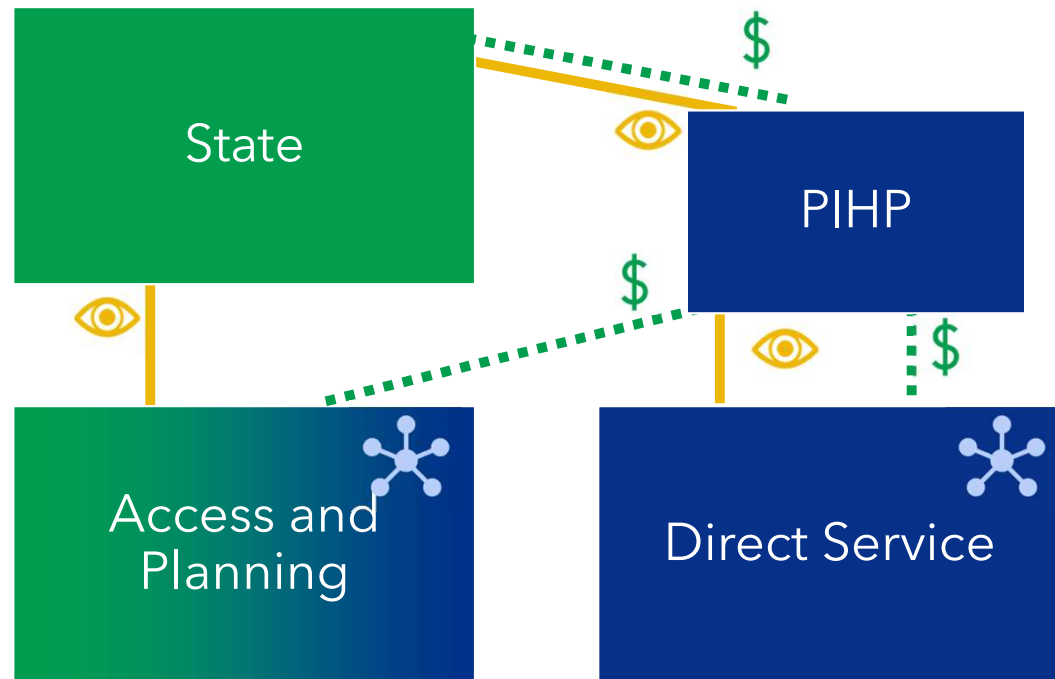
- System manages DS providers as it currently does.
- PIHP manages a separate group of AP providers.
- AP provider organizations cannot also provide direct services.



Family Three: State Oversight/ PIHP Funded

Change From Current System

- System manages DS providers as it currently does.
- System funds AP providers the same as in current system.
- State directly oversees AP providers.
- PIHP funds but does not oversee AP providers.
- AP provider organizations cannot also provide direct services.



Discuss the Frame Phase





Outputs from Frame

- A list and definition of all criteria and sub-criteria.

- Documentation of feasible options to evaluate based on criteria.

What to expect in Frame

-This phase will be iterative and nuanced.

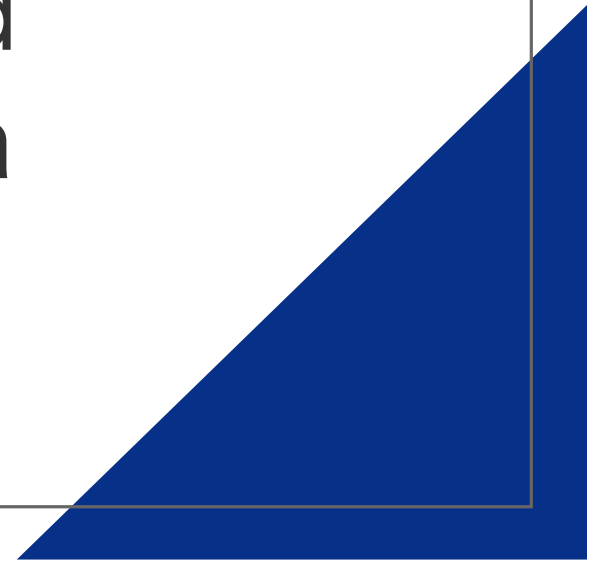
-This phase will last for several meetings.

-There is no need to reach consensus, more than one perspective can be captured.

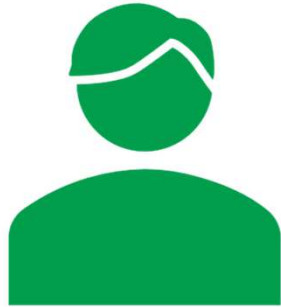
-Only shared thoughts/opinions/concerns can be captured. Please use a method of sharing that works best for you (dialog, chat, feedback form).

Problem Definition and Introduce Draft Criteria

Defining the challenge



Problem Definition In Michigan...



At the Person Level

There is an incentive for a service provider to determine a person eligible/ineligible or to include themselves in the plan.



At the System Level

The system does not require explicit structures to prevent an entity* from acting in its own financial interest at the person level, as defined in federal rules.

*CMH, PIHP, provider

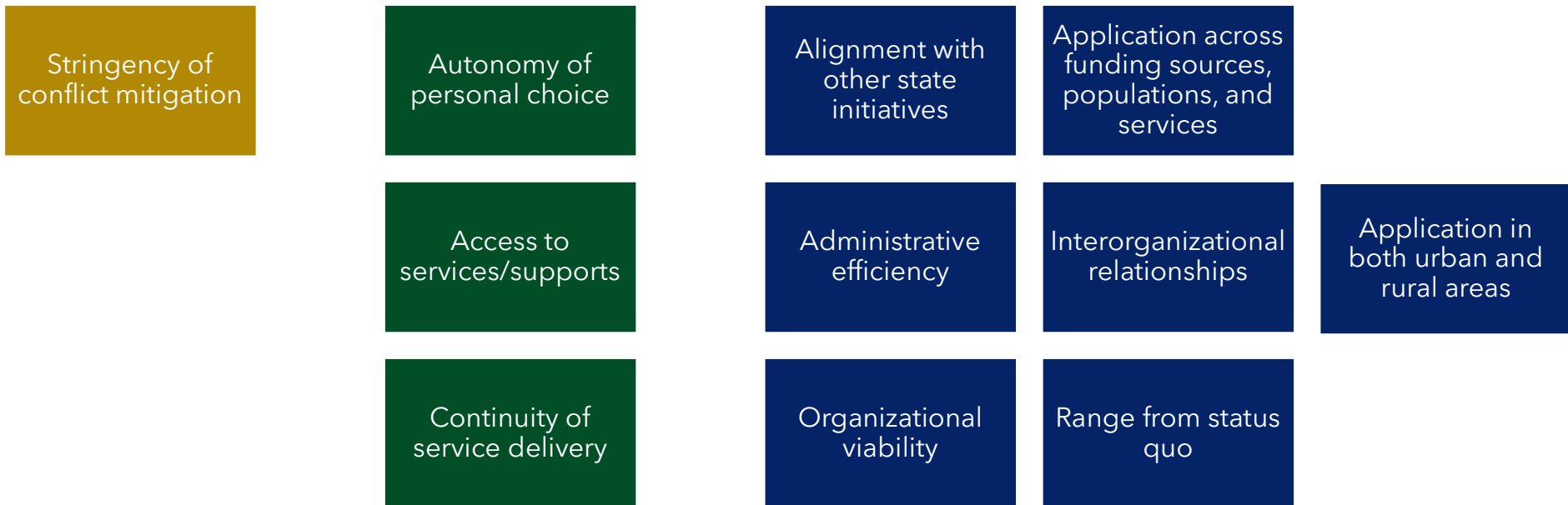


Design Challenge

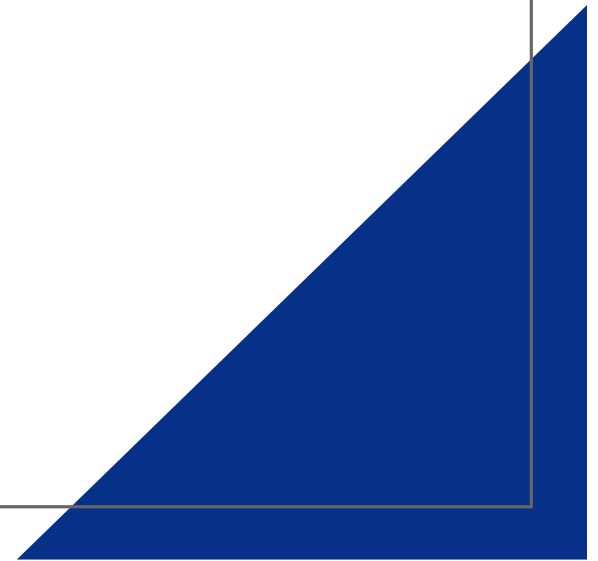
How might the state strengthen protections against conflict of interest in a way which prioritizes the person's experience and uses existing system structures where possible?

Design Challenge

How might the state strengthen protections against **conflict of interest** in a way which **prioritizes the person's experience** and uses **existing system structures** where possible?



Introduce Self- Assessment



Self-Assessment Components



- 13 Questions
- Org. Level
- Org. Type
- Duty
- Conflicts

Self-Assessment Next Steps

-Gather workgroup volunteers to provide feedback.

-Volunteers to make edits using track changes.

-Revised self-assessment to be sent to workgroup.

-Workgroup to complete self-assessment.

-Workgroup to bring considerations back to monthly meeting.