

# Conflict-Free Access and Planning Workgroup

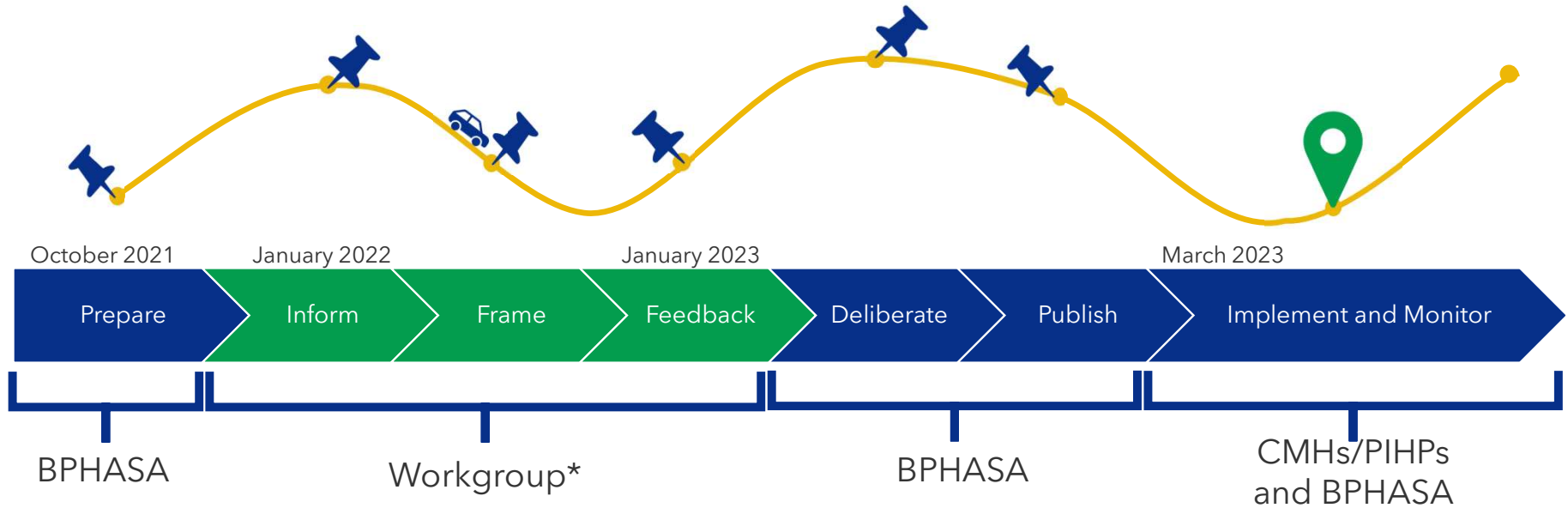
September 28, 2022



# Review Workgroup Journey



# Workgroup Journey



\*Portions of framing and feedback are being considered by BPHASA concurrently

# Review Frame

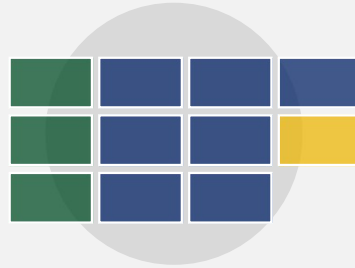
Inform

Frame

Feedback



Define Problem



Define Criteria



Develop Options



Evaluate Options

# Review Frame

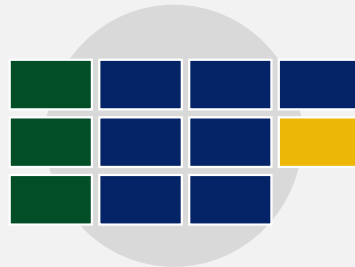
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Define Problem



Define Criteria



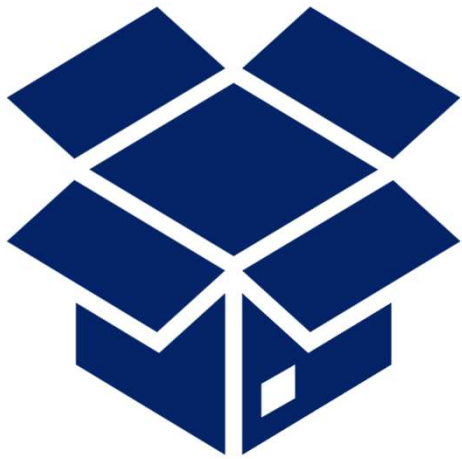
Develop Options



Evaluate Options

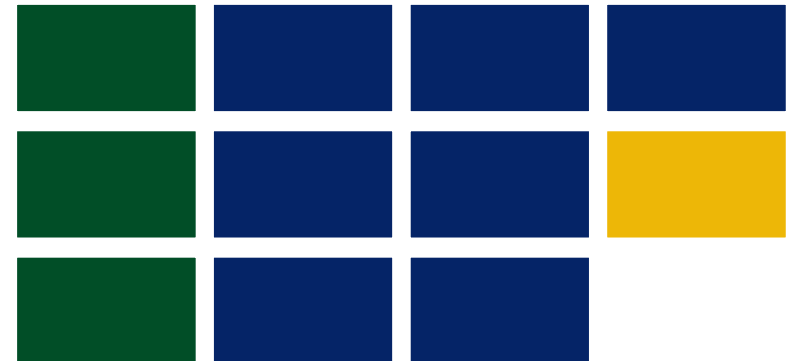
The Workgroup's major role was defining Criteria and Sub-Criteria. Next step is to Prioritize Criteria and Sub-Criteria.

# Options and Criteria



## Option

Options are possible ways the system might be transformed to align with Conflict-Free Access and Planning requirements. Options still need to be developed. The State has not chosen an option.



## Criteria

Criteria are areas that may be impacted (positively or negatively) by changes to the system

# Options and Criteria

Decision makers should consider how each Option impacts:

- Autonomy of Personal Choice
- Continuity of Services/Supports
- Access to Services and Supports
- Alignment in System
- Administrative Efficiency
- System Viability
- Minimal System Changes
- Stringency of Conflict Mitigation



## Criteria

Criteria are areas that may be impacted (positively or negatively) by changes to the system

# Options and Criteria

Survey and listening sessions will capture how workgroup members and people served prioritize Criteria and Sub-Criteria.



## Criteria

Criteria are areas that may be impacted (positively or negatively) by changes to the system



## "How" and Implementation Considerations

<b>Question or Statement</b>	<b>Response</b>
Are there current/recent federal "criticisms" or findings on Michigan's performance relative to the relevant regulations or reviews of the waiver programs?	The State has not received any formal citations from CMS regarding conflict of interest. However, the State is expecting scrutiny in the future.
What is the legal precedent or reasoning for CFA&P? What is the legal reasoning behind separating Assessment and Treatment Planning from direct service?	42 CFR 441.730(b) and 441.301(c)(1)(vi).
Will new entities be developed?	Options are not fully defined and none have been selected. It is not clear if new entities will need to be developed to implement CFA&P.

## "How" and Implementation Considerations

<b>Question or Statement</b>	<b>Response</b>
What is the future of Independent Facilitation?	Independent Facilitation is a valuable best practice. A person's right to choose their planning methods are a Criteria. Every Option must consider the impact on Independent Facilitation and other planning methods.
What is the future of telehealth options?	CFA&P activities do not impact the future of telehealth.
Assessments are unique across CMHs and based on the tools available in the EMR.	Standardization of assessment forms is outside of the scope of CFA&P. CFA&P activities must consider who conducts assessments and if they are free of conflict.
How does CFA&P apply to Medicaid Health Plans?	CFA&P applies to any provider of direct service who also conducts assessments, eligibility determinations, and/or is responsible for the plan. CFA&P is relevant to any entity managing those providers.