Adult Services Division
Department of Disabilities, Aging, & Independent Living
280 State Dr., HC 2 South,
Waterbury, VT 05671-2070
Att: Lisa Edson Neveu
Quality Outcomes Specialist

August 24, 2017

Dear Ms. Neveu,

ACES$ Financial Management Services is amending our proposal to include the following letter of reference. We have included four copies of the letter to go with our printed version as well as an additional copy saved to a USB drive. Additionally, we have submitted this letter via email to you on August 24, 2017.

Thank you for the opportunity to bid.

Sincerely,

Kristy Westpfahl Michael

KRISTY WESTPFAHL MICHAEL
DIRECTOR OF FMS RESEARCH AND DEVELOPMENT

Center for Independent Living/ACES$ FMS
1142 Sanderson Avenue
Scranton, PA 18509-2623

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COLORADO CROSS-DISABILITY COALITION

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Julie Reiskin
Executive Director
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303.567.6582 (Fax)

August 23, 2017

To Whom It May Concern:

I am writing wearing several hats to wholeheartedly endorse Aces$ Financial Management as a fiscal intermediary for Vermont. I will begin with the various roles in which I interact with Aces$.

1) I personally use our Medicaid HCBS consumer direction program and use Aces$ as my fiscal intermediary.
2) I am the authorized rep for several other people, all but one use Aces$ and the one that does not use Aces$ regrets having made that decision.
3) I direct the Colorado Cross-Disability Coalition, which is the largest disability rights organization in Colorado. As an advocacy organization run by and for people with disabilities, consumer direction is a key priority of our community so we work with all organizations that have anything to do with consumer direction.
4) As a leader in the disability community and the co-author of the original legislation, I am very involved with the oversight committee that manages all policy issues related to participant directions.

In all of these areas Aces$ has been a stellar partner. They are in this business because they are part of the disability community, therefore their accountability is high. They are very receptive to suggestions, on all levels. They constantly seek input to understand how they can improve their services.

We went from a single FMS to having three FMS choices. When Aces$ started doing business here, I got calls from people who were blown away by the level of customer service. As an advocacy organization, we usually get calls when things go wrong. Because the customer service was so vastly superior to what we had experienced over two different vendors over more than a decade, people were literally shocked and not sure how to respond to excellent, respectful, customer service.

When a suggestion is made, they take it seriously and act on it. There have been suggestions made including changes in their paperwork formatting, time sheet submission portal, etc. They take the suggestion, go back and each time they either implement the suggestion, or if that is not possible they work with us on how to meet the need (or tell us when the implementation can take place).

If there is a problem, even when the problem is the fault of the client/employer, they work immediately to resolve the problem. Recently an employee made an error on a timesheet that caused it not to be paid. It was an error of the employee and not caught by the employer. Despite the fact that it was not their problem Aces$ worked very hard to get the employee paid. This is not unusual, but how they handle any issue.

Aces$ spends a lot of time in the community-they reach out to disability organizations regularly. Their CEO Tim Moran has been to Colorado on many occasions to support our community. For example, he came out on his own dime to speak with our Governor at an event on employment of people with disabilities. This was done solely because it is important to the community.

Aces$ has made efforts to hire people with disabilities including people on Medicaid. Any organization that works in the disability community should be like this but few make the effort.

Finally, they provide excellent, efficient services. We continue to hear very positive comments about Aces$ from throughout the state. As a leader in the disability community, director of the largest advocacy organization, a client and an authorized representative I wholeheartedly support Aces$ for any contract in any state supporting participant direction.

Sincerely

Julie Reiskin, LCSW

Executive Director

2017

FISCAL/EMPLOYER AGENT SERVICES

ACE$ FINANCIAL MANAGEMENT SERVICES

TECHNICAL PROPOSAL

Submitted to:
STATE OF VERMONT
Department of Disabilities, Aging and Independent Living
Adult Services Division

ACE$ Financial Management Services
1142 Sanderson Avenue
Scranton, Pennsylvania 18509
www.MyCIL.org

8/23/2017

FISCAL/EMPLOYER AGENT SERVICES

ACES$ Financial Management Services

1142 Sanderson Avenue

Scranton, Pennsylvania 18509

www.MyCIL.org

8/23/2017

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Letter

Lisa Neveu, Quality Outcomes Specialist
Department of Disabilities, Aging and Independent Living
Adult Services Division
280 State Drive HC 2 South
Waterbury, VT 05671-2070

August 23, 2017
Re: RFP for Fiscal/Employer Agent Services

Dear Ms. Neveu,

ACES$ Financial Management Services, a subsidiary of the Northeast Pennsylvania Center for Independent Living, is pleased to respond to the Request for Proposal seeking qualified vendors for the provision of Fiscal/Employer Agent (F/EA) Services, or participant and surrogate directed services, in the state of Vermont. We have a strong and successful history of performing F/EA Services in the States of Illinois, Colorado, Wyoming, Georgia, Maryland and Pennsylvania. ACES$ was recently awarded the FMS Goods and Services contract for the State of Washington, after a highly competitive bidding process.

We are the largest, non-profit FMS provider in the United States. As a Center for Independent Living (CIL), we are dedicated to improving the lives of individuals with disabilities. We pride ourselves in administering quality services with dedicated customer service to a population that is near and dear to our organization's mission.

As a CIL, we have decades of experience serving people with disabilities; over fifty-one percent (51%) of our own staff have a disability. Fifteen percent (15%) of our staff either have a developmental disability, or are the parent of a child with a developmental disability. Our CEO, Tim Moran, has a physical disability and is the parent of a child with Trisomy 21/Down syndrome. Some of our staff and board members actively use our services. Every day we personally see and experience the benefits our services provide and this makes us unique in the world of FMS providers.

We wholly embrace the philosophy of self-determined services, and believe that Participants should have:

- Freedom to plan an independent life with the supports they need
- Authority to control their support dollars and responsibility for the use of those dollars
- Support to live and be involved in the community in a way that suits their preferences
- Responsibility to direct how and when supports and services are received

ACES$ has the financial strength to work with Vermont should we be awarded this contract. We have experience with very large programs that require the same, if not larger, advancement of authorized funds. We possess more than sufficient unencumbered reserves to maintain a minimum of two (2) months of payroll cycles (best practice) for Employee services, as well as goods and services provided to program Participants. ACES$ has never required a state agency to pay us in advance for program payroll, services or fees, nor will we. We feel this is a poor business practice and damaging to the States with which we work.

Additionally we do not require the use of subcontractors to fulfill any portion of our contracts; this includes our online FMS portal, any other core F/EA functions as well as our EVV solution. All of our services are executed in-house, including our proprietary online system and EVV solution. We will not use subcontractors if awarded this contract.

We do not propose any exceptions to any terms and conditions set forth in this RFP, including the Standard State Provisions for Contracts and Grants.

Our proposal consists of the following information and enclosures:

- Understanding of the Scope of Work
  - We provide an overview of our understanding of the scope and the alignment of our capabilities in this section.
- Qualifications
  - In this section, we describe our qualifications and our organizations established proficiency as a fiscal agent, as well as a self-direction, independent living and disabilities expert. We outline all relevant contracts to demonstrate our technical capability as well as our staff demonstrated skill sets. We provide information on subcontractors, staffing, references as well as insurance.
- Technical Capabilities

    - In this section, we provide an overview of our operating systems and capabilities as they relate to the scope of work within the RFP. Areas covered include:
        - Online Operating System
        - EVV
        - Customer Service
        - Enrollment
        - Training
        - Payroll
        - Tax Operations
        - Goods and Service Processing
        - Billing
        - Financial Strength
- Evaluation and Performance Measures
    - We have provided a summary of our internal QA/QI process in this section to demonstrate how we evaluate our own performance relative to the RFP requirements for the scope of work.
- Work Plan
    - In this section, we describe the proposed approach for producing each required element, including a high-level description of the method used to produce the elements described in Section 2 of the RFP. A Gantt chart is provided to address timeline requirements and tasks.
- Reporting Requirements
    - In this section, we provide an overview of our standard reports and customization opportunities, which we provide for every contract.
- Certificate of Compliance
- Price Quotation/Proposed Reimbursement
- Attachments
    - We have included several samples of our work, as well as our most recent financial audit and an example of our Quality Assurance/Quality Improvement Matrix.

ACES$ has many characteristics that qualify us to undertake this opportunity and exceed Participant and State expectations. We possess personal and professional experience serving persons with intellectual, developmental, physical disabilities and other long-term care needs across the country. Our expertise includes person-centered thinking and the model of self-direction; staff with exceptional F/EA knowledge and skills; a highly responsive Consumer Care staff; state-of-the-art F/EA timesheet and payroll processing technology; and the financial reserves to establish and run the program. Our experience with similar waiver programs has demonstrated quality and cost-effective outcomes. We have a lower Per Member/Per Month (PM/PM) rate than many of our competitors, without sacrificing quality.

Choosing ACES$ as your F/EA services provider benefits the State, the Consumer Directed Programs, Workers/Employees, and, most importantly, the Participants enrolled in the program. We know you have worked hard to achieve national success in LTSS. AARP recognized Vermont as 3rd nationwide in the delivery of Long-Term Services and Services. ACESS would be proud to contribute further to this success.

We are grateful for the opportunity to respond to your request.

Sincerely,

Timothy J. Moran, Chief Executive Officer
Northeast Pennsylvania Center for Independent Living/ACES$ Financial Management Services
1142 Sanderson Avenue
Scranton, PA 18509
tmoran@mycil.org
570.207.9096

Understanding of Scope of Work

Providing Fiscally Responsible and Consumer-driven (F/EA) Services

ACES$ Financial Management Services has a keen understanding of what it means to provide fiscally responsible and consumer-driven Fiscal/Employer Agent (F/EA) services and supports. As part of the Northeast Pennsylvania Center for Independent Living (CIL-established in 1988), ACES$ is a Consumer-directed, payroll management solution for Medicaid recipients, non-Medicaid program Consumers, and their employees. As a Center for Independent Living, we have almost 30 years of hands-on experience serving persons with physical, intellectual, and developmental disabilities. We have been serving as an FMS entity since 1995, providing FMS under the F/EA model for multiple states, waivers and disability populations across the age continuum. As a Center for Independent Living, we have experience providing essential guidance and options to individuals who want to live independently and successfully in the community of their choice. In addition to over 20 years of providing FMS for Consumer-directed services, ACES$ is pleased to work alongside our CIL partner staff, as the CIL develops exciting services for individuals with intellectual and developmental disabilities. For example, in 2016 we opened the Transitional Skills Center for students ages 14-21 with intellectual and developmental disabilities. (For more information, please visit: http://www.mycil.org/tsc.html

Success in Partnering with Multiple Agencies, Staff and Communities

Working with the State

We are well positioned and eager to work with the Vermont Agency for Human Services (AHS) and its Department of Disabilities, Aging and Independent Living (DAIL) and the Department of Health in carrying out this work. Our primary role under this contract will be to provide fiscally sound employer support and payroll services (FMS) for five distinct Medicaid programs providing long-term services and supports where consumer/self-direction is available. Four of these programs are under the auspices of DAIL including Choices for Care (CFC)/Flexible Choices, the Attendant Services Program (ASP), and the Traumatic Brain Injury Program (TBI), and Developmental Disabilities Services. The Adult Services Division of DAIL manages the first three programs, while the Developmental Disability Services Division within DAIL manages the Developmental Disabilities Services program. The final Medicaid program is the Children's Personal Care Services (CPCS) managed by the Department of Health (DOH)/Division of Children Youth and Families/Children with Special Healthcare Needs unit. In addition to these programs, ACES$ will serve as the billing agent for family directed nurse-providers in the Medicaid Self/Family Directed Hi-Technology Nursing (HTN) program.

While we recognize that each of these five programs have some common operational elements, such as determining clinical and financial eligibility, conducting intake and assessments, and providing care coordination, we are very aware that each operates uniquely according to state regulatory and departmental guidelines and advocacy input based upon the population of focus. Of importance to this contract is that ACES$ is very familiar with the supports and service needs of the populations of focus: adults, older adults and children with intellectual, developmental and physical disabilities served through these programs. Since ACES$ operates F/EA services in many states, we are accustomed to effectively managing programs under a variety of different structures and under the watchful eye of many interested stakeholders. Several of our state contracts cover multiple programs with varying program regulations and requirements, similar to this scope of work.

With all of our contracts, we establish routine meetings with our contract officer/project manager and participate in community advisory meetings as recommended. During the kick-off meeting, ACES$ will work with DAIL to identify all other key stakeholders and organizations in order to establish a Statewide presence. We will build these references into our Communication Plan, which we develop for each contract, and will modify our FMS Communication Policy as needed. We will reach out to these entities to conduct in-person orientations with staff that work with each of respective agencies. We do this within early stages of contract award and throughout the contract. This outreach will be particularly important as we transition and during the early months of service implementation.

We will align our FMS policies and procedures with DAILs, as we do with any new state contract's start-up procedures. Each aspect of our Work Plan takes into consideration program/waiver requirements and any changes to Vermont state policies that might, for instance, require modifications to: our FMS Policy and Procedure Manual; orientation, outreach, and education methods and materials; training curricula; and payroll and billing systems, etc.

Communicating, Collaborating, and Coordinating, across Diverse Stakeholders

ACES$ values the importance of communication and collaboration, in order to ensure coordination. Given the structure of LTSS in Vermont, we see another objective working with DAIL and its designated agencies/regional offices, it to create the relationships necessary to fulfill our contractual, as well as personal, commitments to our role. Our focus is to help Participants achieve the goal of successful integration and independence in home-based or community living, competitive employment and community involvement. To do this we need to understand the role of each entity that has a connection to those opting to self-direct services. For each contract, we develop a Communication Plan that outlines key audiences, roles and responsibilities, meeting schedules, etc. We explore how to communicate and collaborate at each step in the service delivery process. For example, how do individuals access the system, where are the entry points for intake and assessment, who is accountable for making financial and clinical eligibility determinations? As an F/EA provider in multiple states, we are accustomed to working with a wide array of state agencies, system entry points such as the designated agencies AAA/ADRCs as well as community-based organizations, advocacy groups and providers who serve these individuals.

Effective communication and collaboration leads to better coordination. Coordination in turn is a key practice that helps to avoid service duplication, minimize gaps in care, and create more efficient and less costly systems. The processes of communication, collaboration and coordination at both the local and State levels are part of our business. **We are relationship-oriented, not transaction driven. We consider this part of our mission, direction, and ultimately, our success.**

Aligning ACESS' Values and Principles with the State's

You will see throughout our proposal that ACES$ embodies the same values and principles as DAIL. With each contract, we approach our role with the following in mind:

<u>Support the tenets of person centered planning, informed choice, self-direction, integrated living, and community inclusion.</u> ACES$ has a keen understanding of Person-centered planning, informed choice, and Consumer-direction. We also are familiar with the resources and information required for promoting and encouraging self-advocacy. We understand that some HCBS services are delivered under a managed long term services and supports (MLTSS) system through managed care organizations, while others are delivered in a fee-for-service environment. In either scenario, we are prepared to engage and educate Participants and Surrogates, on an individualized basis, in directing their services based upon their person-centered plan of care.

First, we serve the consumer. ACES$ does not just *espouse* Consumer-directed services; it *embraces* Consumer-directed services. The organization is *enthusiastic* about Consumer-directed services. Approximately 51% of our staff experience disability. We live it every day -- we have employees who, themselves, are recipients of these services and Board members who also use the Consumer-directed model. We thoroughly understand the need to provide a quality product and service because many of us depend on this very system for ourselves. As an organization that embraces the philosophy of Consumer-directed and Self-determined services, we believe that Consumers should have:

- Freedom to plan an independent life with the supports they need
- Authority to control their support dollars and responsibility for the use of those dollars
- Supports to live, work, *and* be involved in the community in a way that suits their preferences
- Responsibility to direct how, when, and where supports and services are received

Reduce the Participant/Surrogate burden as an Employer. ACES$ works tirelessly to minimize the programmatic burden on Participants and their Surrogates. We do this by ensuring access to information through the right method (face-to-face, telephone, written) and in the right format (language, technology, large print, Braille). We provide exceptional customer service to minimize wait times, repetitive inquires, and service delays. We ensure well-qualified and safe direct service workers to minimize turnover and prevent fraud, waste and abuse. We provide detailed staff, Participant/Surrogate/Care Coordinator training, so that FMS processes are smooth and all parties are extremely satisfied. Paper work is completed and submitted according to pre-established timeframes and always is on time. We implement comprehensive, Employer, Employee and Service Coordination satisfaction surveys to assess how well we are helping Participants/Surrogates reach these goals.

Espouse Creativity. ACES$ takes pride in being ahead of the curve. Our CEO, Tim Moran, has weekly meetings with the leadership team, and monthly with staff, to brainstorm creative approaches to our services, identify opportunities to improve business practices, review data to inform decisions about operations, and to ensure that every Participant is living life as independently as possible. From these meetings comes ideas such as the development of our state-of the-art payroll and budget management system. We can ensure that service budgets are managed and funds allocated according to the Participant's plan of care. From our collective efforts, we also developed the Transitional Skills Center for students ages 14-21 with intellectual and developmental disabilities.

Implement Best Practices. ACES$ maintains up-to-date policies and procedures that include all federal and state regulations and requirements, as well as best practice accounting procedures. Our policies and procedures manual incorporate all programmatic and regulatory requirements. We customize this manual for each program and update it to reflect the regulations and requirements that vary by program or state. We do this annually (at a minimum) and as regulations and requirements change.

Handle Goods and Services reimbursements with the same sensitivity and sense of urgency as our payroll administration. ACES$ has significant experience with monitoring expenditures and reimbursements for approved items, ensuring that the goods and services reimbursed are authorized and payment is timely. Unlike our competitors, we process requests quickly to ensure Participants do not have gaps when renewing purchases, such as meal services or disposable medical supplies. It is important for Participants to know they do not have to go without a needed item or worry about when they will be reimbursed for an item they are already approved to purchase. We understand that these approved goods and services are often critical to the Participant's wellbeing and safety, not just something they "want". With that in mind, many of our existing contracts offer goods and services, in addition to payroll for workers.

Ensure program oversight. ACES$ has detailed quality improvement processes that include oversight of all contract requirements and deliverables. We develop and implement a detailed Work Plan, a Communication Plan, and a Quality Improvement Plan, and will update these to include any requested modifications and performance measures that DAIL has outlined within the RFP. We have predefined FMS and customer service metrics to monitor the accessibility, accuracy, and timeliness of FMS duties. In addition, our CEO conducts weekly meetings with the leadership team and key staff to review operational performance on all contracts. We propose to assign a member of the leadership team to the MCO to ensure appropriate regional oversight and collaboration of FMS.

Anticipate and plan for growth. ACES$ has a growth plan in place that requires us to monitor workflow, productivity, and the number of Individuals enrolled in the programs we serve. As programs grow, we increase staff accordingly. Additionally, we design internal system efficiencies to improve workflow, as needed.

Qualifications

ACES$ Financial Management Services, part of the **Northeast Pennsylvania Center for Independent Living** (established in **1988**), is a Participant-directed, payroll management solution for Medicaid recipients, non-Medicaid program Participants, and their employees. As a Center for Independent Living, we have almost **thirty (30) years** of experience serving persons with physical, intellectual and/or developmental disabilities. We have been serving as an **FMS entity since 1995**, providing services under the Fiscal/Employer Agent (F/EA) model for multiple states, Medicaid waivers and populations since that time.

We have outlined in ***Table 1*** below, a complete list of all relevant contracts/clients. We also provide a list of common tasks performed in these contracts.

Complete, Relevant and Current Clients

ACES$ serves as the reporting agent for the government, Fiscal/Employer Agent (F/EA), as defined in section 3504 Agent Employment Tax Liability (REG 137-36-08-1), for the states of Illinois, Colorado, Wyoming and Georgia. Additionally, we serve as the F/EA for Maryland's Veteran-Directed Home and Community-Based Waiver Program (VD-HCBS), along with multiple VD-HCBS programs in Illinois and Colorado. As a Section 3504 Agent, ACES$ shares liability with the Employer with regards to withholding, reporting, and paying of federal employment taxes relative to wages paid by the Agent for the Employer. Additionally, ACES$ further shares liability with the Employer regarding their Social Security, Medicare, and federal income tax withholding responsibilities. This includes Revenue Procedure 70-6, 1970-1 C.B. 420, as modified by the January 13, 2010 Proposed Notice of Rulemaking: *Section 3504 Agent Employment Tax Liability* (REG 137-36-08-1), and any other revenue procedures, notices, or subsequent publications promulgated by the IRS, to include Revenue Procedure 2013–39. Finally, ACES$ was recently selected to provide FMS for Goods and Services for Self-directed programs in the State of Washington, after a highly competitive bidding process.

ACES$ performs the following Financial Management Services (FMS) functions in all contracts we serve:

- Obtain IRS and state approval to be an Employer Agent
- Obtain authorization from the state unemployment insurance agency for the limited purpose of managing unemployment taxes for each Participant
- Prepare and file IRS Form SS-4, Application for Employer Identification Number, and obtain separate FEIN for the purpose of filing IRS Form 941, Employer's Quarterly federal tax return and W-2, Wage and Tax Statement, filing federal form 940 Unemployment Tax Return, as an Employer Agent
- Prepare and file IRS Form SS-4, Application for Employer Identification Number (FEIN), and obtain a FEIN for each Participant

- Verify employees' citizenship/legal alien status by verification of social security number with the Social Security Administration and completing the Bureau of Citizenship and Immigration Services (BCIS) Form I-9
- Ensure that wages paid to Participants' employees are in compliance with federal and state labor laws
- Compute, withhold, file, and deposit federal Medicare and Social Security (FICA) and federal income tax as required by law
- Withhold, file and deposit state income taxes for workers, even when federal and state tax rules deem this optional for domestic service workers
- Refund over-collected FICA withholding to employees and Employers (or state) when employees do not earn the FICA wage threshold for a particular calendar year
- Annually compute, withhold, file, and deposit federal unemployment taxes (FUTA) individually for each Participant, using the Participant's FEIN to match state unemployment tax (SUTA) filing process (done in the aggregate utilizing 940 Schedule R procedure)
- Refund over-collected FUTA withholding to Employers (or state) when Employer's employees, in the aggregate, do not earn the FUTA wage threshold for a particular calendar quarter in the current or previous calendar year
- Compute, withhold, file and deposit state income taxes individually
- Compute, withhold, file and deposit state unemployment insurance taxes (SUTA); individually and refund over-collected SUTA to Employers (or state) as necessary
- Apply judgments, garnishments and levies to employees' paychecks, as applicable
- Prepare and file IRS Form W-2, Wage and Tax Statement in accordance with current IRS instructions for agents
- Retire a Participant's IRS Form 2678 and IRS Form 8821 when the Participant is no longer an Employer represented by the F/EA
- Retire a Participant's FEIN and state tax registration number(s), and terminate federal and state tax filings when the Participant is no longer an Employer
- Carry out any other payroll and tax function necessary to ensure compliance with federal and state laws and program rules (e.g. Temporary Disability Insurance)
- Process payroll from timesheets signed and submitted by employees and Participants, and ensure payment of each within ten (10) calendar days of the

end payroll period (modified if necessary per specific state guidelines), with payroll issued at least twice a month

- Provide Participants and employees with timesheet forms for signature and submission, and provide an alternate mechanism to submit timesheets via fax or online that is secure and verifiable
- Provide the option of Direct Deposit of pay for Participants' employees
- Process payment/reimburse and track authorized goods and services

ACES$ Financial Management Services has been providing F/EA services since **1995**. We began providing services for the Northeast region in Pennsylvania. We covered the waiver programs listed below, serving approximately 800 Participants until 2012 when the state re-organized their FMS provision across the Commonwealth, transitioning from a multiple regional provider model to a sole provider who, at the time, was external to the state.

- **OBRA Waiver**: serves Individuals ages 18-59 for whom a developmental disability manifested itself before the age of 22
- **Independence Waiver:** serves Individuals ages 22-59 who are physically disabled, mentally alert, and the disability occurred after age 22
- **COMMCARE Waiver:** serves Individuals, ages 21 or older, with a traumatic brain injury diagnosis
- **Aging Waiver:** serves appropriate level of care Individuals ages 60 and over
- **Employee Care Waiver:** serves Individuals, ages 18-59, with a physical disability that will last more than one (1) year
- **ACT 150 Waiver:** serves Individuals, ages 18-59, with a physical disability

In **2007**, we expanded our services beyond Pennsylvania when awarded the FMS contract for Adult and Children's Developmental Disability Waivers in Illinois. We have been serving those programs ever since, and currently provide F/EA services to approximately 7,600 Illinois Participants and nearly 16,000 workers.

Experience and Contracts

We outline our current and prior contracts in ***Table 1*** below. In addition to providing basic contract information, we also list the waiver program and populations we serve, to demonstrate further our experience.

Table 1: Contracts - Current/Prior Experience

1. Contract Information: Colorado	
Name of Reference Company:	**Colorado Department of Health Care Policy and Financing**
Dates of Services:	2015- Present
Description of Services Performed:	F/EA and AwC models of FMS for multiple waivers. Colorado eliminated AwC in 2016. **Number of Individuals:** 492 Clients **Number of Employees:** Currently providing services for 1,700+ employees **Types of Individuals:** Individuals using this program must be on one of the following waivers: Brain Injury (BI); Community Mental Health Supports (CMHS); Elderly, Blind and Disabled (EBD); and Spinal Cord Injury (SCI).
2. Contract Information: Illinois	
Name of Reference Company:	**Illinois Department of Health and Human Services**
Dates of Services:	2007 - Present
Description of Services Performed:	**Description of Services Performed:** F/EA model of FMS services for the Children and Youth with Developmental Disabilities and Adults with Developmental Disabilities Waivers **Number of Individuals:** 7,623 Individuals **Number of Employees:** Over 16,000 Personal Support Workers **Types of Individuals:** Individuals between the ages of 3 to 21, living at home with their families, and at risk of placement in an Intermediate Care Facility for persons with Developmental Disabilities (ICF/DD); or Individuals age 18 or older with Developmental Disabilities who are at risk of placement in an Intermediate Care Facility for persons with Developmental Disabilities (ICF/DD).
3. Contract Information: Wyoming	
Name of Reference Company:	**Wyoming Department of Health**

Dates of Services:	**2016 - Present**

Description of Services Performed:	**Description of Services Performed:** F/EA model of FMS services for the Long Term Care, Acquired Brain Injury, Comprehensive and Supports Waivers.
	
	Number of Individuals: 983 Individuals
	
	Number of Employees: Over 1,600 Personal Support Workers
	
	Types of Individuals:
	• **LTC Waiver**: older adults with Long Term Care needs
	  ○ 623 Participants
	• **Acquired Brain Injury, Comprehensive and Supports Waivers:** serves Individuals with ABI or DD, I/DD.
	  ○ 360 Participants

4. Contract Information: Georgia	
Name of Reference Company:	**Georgia Departments of Aging, Behavioral Health, Developmental Disabilities and Community Living**
Dates of Services:	**2016 - Present**
Description of Services Performed:	**Description of Services Performed:** FMS services under the F/EA model for Individuals enrolled in the New Options Waiver (NOW), Community Care Services Program (CCSP), Comprehensive Supports (COMP), and Independent Care Waiver Program (ICWP) who are self-directing their care. **Number of Individuals:** TBD – Georgia is a state offering FMS provider choice. It has yet to be determined how many Participants we will have annually. Anticipate 250 Individuals at end of 2017. **Number of Employees:** TBD - Anticipate 250 workers at end of 2017 **Types of Individuals:** Older adults and Individuals with BH, DD, BI and physical disabilities with nursing facility, mid to high level of care needs who are Self-directing their care.
5. Contract Information: Illinois VD-HCBS (9 individual AAA/ADRC contracts)	
Name of Reference Company:	**Northeastern Illinois Agency on Aging, Central Illinois Agency on Aging, East Central Illinois Area Agency on Aging, Midland Agency on**

	Aging, Southeastern Agency on Aging, Egyptian Area Agency on Aging, Age Options
Dates of Services:	2016- Present
Description of Services Performed:	**Description of Services Performed:** FMS services under the F/EA model for Veterans enrolled in the program **Number of Veterans:** 113 **Number of Employees:** 302 **Types of Individuals:** Veterans with nursing facility, mid to high level of care needs
6. Contract Information: Colorado VD-HCBS	
Name of Reference Company:	**Mesa County, CO AAA**
Dates of Services:	2015-Present
Description of Services Performed:	**Description of Services Performed:** FMS services under the F/EA model for Veterans enrolled in the VD-HCBS program **Number of Veterans:** TBD – currently 19, estimated 50 by end of year **Number of Employees:** 30 Workers **Types of Individuals:** Veterans with nursing facility, mid to high level of care needs
7. Contract Information: Colorado VD-HCBS	
Name of Reference Company:	**Independence Center – Colorado Springs**
Dates of Services:	2015-Present
Description of Services Performed:	**Description of Services Performed:** FMS services under the F/EA model for Veterans enrolled in the VD-HCBS program **Number of Veterans:** TBD – currently 58, estimated 100 by end of year **Number of Employees:** 111 Workers **Types of Individuals:** Veterans with nursing facility, mid to high level of care needs

8. Contract Information: Maryland VD-HCBS	
Name of Reference Company:	**Maryland Department of Aging (MDoA)**
Dates of Services:	2015-Present
Description of Services Performed:	**Description of Services Performed:** FMS services under the F/EA model for Veterans enrolled in the VD-HCBS program **Number of Veterans:** TBD – currently at 45, estimated growth to 50-100 within 2017. **Number of Employees:** 171 workers ○ **Types of Individuals**: Veterans with nursing facility, mid to high level of care needs
9. Contract Information: Washington	
Name of Reference Company:	**Washington Department of Social and Health Services**
Dates of Services:	**2017-Present**
Description of Services Performed:	**Description of Services Performed:** FMS services for Goods and Services under the New Freedom Waiver and VDHCBS **Number of Veterans:** 500 Participants **Number of Employees:** TBD vendors **Types of Individuals**: Participants of New Freedom Waiver (elders and adults with disabilities) and Veterans with nursing facility, mid to high level of care needs
10. Contract Information: Pennsylvania (past)	
Name of Reference Company:	**Pennsylvania Office of Long Term Living and Department of Public Welfare (DHS)** DPW oversight for CSPPPD, ACT 150, and ACW waivers and Department of Aging oversight for PDA waiver
Dates of Services:	**1995-2012**

	Pennsylvania re-organized their FMS provision across the Commonwealth in 2012, transitioning from a multiple regional provider model to a sole provider who, at the time, was external to the state. It is the Commonwealth's plan to bring additional providers back in 2017.

Description of Services Performed:	**Description of Services Performed:** FMS services under the F/EA model for the following waiver programs:
	• **OBRA Waiver**: serves Individuals ages 18-59 for whom a developmental disability manifested itself before the age of 22
	  ○ 1995 - 2012
	  ○ 52 Participants
	• **Independence Waiver:** serves Individuals ages 22-59 who are physically disabled, mentally alert, and the disability occurred after age 22
	  ○ 1995 - 2012
	  ○ 263 Participants
	• **COMMCARE Waiver:** serves Individuals, ages 21 or older, with a traumatic brain injury diagnosis
	  ○ 1995 - 2012
	  ○ 9 Participants
	• **Aging Waiver:** serves appropriate Individuals ages 60 and over
	  ○ 2004 - 2012
	  ○ 381 Participants
	• **Employee Care Waiver:** serves Individuals, ages 18-59, with a physical disability that will last more than one (1) year
	  ○ 2006 - 2012
	  ○ 64 Participants
	• **ACT 150 Waiver:** serves Individuals, ages 18-59, with a physical disability
	  ○ 2006 – 2012
	  ○ 49 Participants

Experience with Multiple Stakeholders

ACES$ understands the value of working with key stakeholder groups who understand, and are representative of, the needs of vulnerable populations, such as the Participants served by DDS, CPCS, ASP, TBI, and CFC (including the Flexible Choices (FC) option and the Moderate Needs Group (MNG). As an F/EA provider in several states, we are accustomed to working with a wide array of state agencies and system entry points where our Participants can be met (such as AAA/ADRCs), as well as community-based organizations and providers who serve these Participants.

With all of our contracts, we establish routine meetings with our contract officer/project manager and participate in community advisory meetings as recommended. During the kick-off meeting, ACES$ will work with the state to identify all other key stakeholders and organizations in order to establish a Program and statewide presence. We will build these references into our Communication Plan, which we develop for each contract, and will modify our FMS Communication Policy as needed. We will reach out to these entities to conduct in-person orientations with staff that work with, or refer to, DDS, CPCS, ASP, TBI, and CFC programs. We do this within early stages of contract award and throughout the contract. This outreach will be particularly important as we transition and during the early months of service implementation. Key partnerships and relationships will assist in acclimating all to the changes in FMS provision. We have various advisory opportunities for Participants and other stakeholders in all of our contracts. In particular, we ask stakeholders for their input and participation in testing our software, which we customize to reflect program rules and regulations of every contract. We intend, as required, to have a Participant Advisory Group for this contract, meeting all necessary stakeholder requirements.

Our FMS policies and procedures will align with Vermont's programs, as we do with any new state contract's start-up procedures. The processes of coordination and collaboration with state agencies, Care/Support Coordinators/Case Managers, Area Agencies on Aging or Aging and Disability Resource Centers, CILs, and other relevant advocacy organizations, at both the local and State levels are part of our business. **We are relationship-oriented, not transaction driven. We consider this part of our mission, direction, and ultimately, our success.**

We are members in good standing of the National Resource Center for Participant-Directed Services (NRCPDS) supported by Applied Self-Direction, where we serve on a number of sub-committees such as Block Grant Research Committee; Advancing Self-direction in a Less Regulated Environment Committee, and RFP Best Practice Committee. Additionally, we are members of a number of Disability, Independent Living and accounting organizations such as the Association for Developmental Disability Providers (ADDP), National Council on Independent Living (NCIL), the American Payroll Association (APA), and many others. Being active members in these organizations allows us to stay abreast of upcoming trends, concerns and issues, as well as provides us an opportunity to network with and mentor other organizations.

In addition, we have contacts within the Internal Revenue Service who are subject matter experts on Home Care Service Recipients (HCSR). Should we need to resolve an issue, or have any questions, we are able to use these contacts.

Subcontractors

ACES$ does not require the use of subcontractors to fulfill any portion of our contracts; this includes updating and ongoing maintenance of our online FMS portal, any other core F/EA functions as well as our EVV solution. All of our services are executed in-house, including our proprietary online system and EVV solution. We will not use subcontractors if awarded this contract.

Staffing

ACES$ has a deep understanding of Self-directed and Self-determined programs and how to implement them. Our partners appreciate that we hit the ground running and work with them as an active stakeholder to provide a sustainable program with oversight mechanisms that prevent the fraud and abuse many fear target Participant-directed programs.

As a Center for Independent Living and an FMS provider, the opportunity and responsibility to recruit qualified persons with disabilities is important to us. To demonstrate this, the majority of our employees (51%) have a disability. We view this not as a requirement for a contract, but a requirement within our business model.

ACES$ ensures all FMS policies and procedures are in line with generally accepted accounting principles (GAAP). It is our belief that providing quality services and a personalized experience is a shared responsibility amongst all ACES$ staff. Our payroll and accounting staff are certified and licensed professionals. We employ three (3) Certified Payroll Professionals (CPPs) as well as two (2) staff members with Fundamental Payroll Certifications (FPCs), all certifications qualified by the American Payroll Association. Additionally, we employ three (3) E-Verify Certified Staff members. We ensure that our payroll and tax professionals stay abreast of national and state regulations, as well as upcoming legislation.

Staffing Plan

We have developed a proposed staffing plan, which we will further define and, if awarded the contract, will solicit feedback from the state and revise accordingly.

We have outlined the project's human resources requirements and our plan to fulfill them. We include below the following:

- **Project Roles and Responsibilities** – summarizes the responsibilities for each role required to conduct the project work
- **Project Staffing Estimates** – identifies estimated staffing requirements
- **In-State Presence** – identifies plan for establishing physical space in-state

- **Acquisition Strategy** – describes when, how, and from what sources staffing will be acquired
- **Internal Staff Training Plan** – identifies skill gaps and details specific training requirements for each project team member
- **Organizational Chart** – displays project reporting relationships
- **Key Staff Bios and Resumes**

Key Staff Project Roles and Responsibilities

We have provided a personnel roster below (***Table 2***) that includes the staff name, title, location, contact, and role of each key staff person. Additionally, we will utilize support staff within Payroll, Tax and Accounting. The number of staff in each department is:

- **Payroll** – Thirteen (13) staff members to include: Diane Alberigi, Director of Payroll Services, two (2) Payroll Managers, two (2) Consumer Care Specialists, two (2) Employee Records Specialists and six (6) Payroll Specialists.
- **Tax** - Six (6) staff members to include: Duane Seidel, Director of Tax Operations, one (1) Tax Supervisor, one (1) Budget Supervisor, two (2) Tax Specialists and two (2) Budget Analysts
- **Accounting** – Ten (10) staff members to include: Mike Mellody, Chief Financial Officer, Helen Logan, Director of Accounting, Mari Pacyna, Director of Finance, four (4) Accountants, two (2) Accounts Payable Analysts, and one (1) Senior Financial Analyst.

Table 2: Key Staff Roles, Contact Information and Percentage of Time on Vermont Programs

No.	Staff Name	Title	Location	Contact Information	Contract Role/ Percentage of Time
1.	Tim Moran	Chief Executive Officer	Scranton, PA	tmoran@mycil.org (570) 344-7211	• High-level project oversight • Supervises work of Vermont Program Director and other staff related to project start-up • 15% of his time
2.	Michael Mellody	Chief Financial Officer	Scranton, PA	mmellody@mycil.org (570) 344-7211	• Oversight of all financial obligations, with specific oversight for accounting, tax compliance and payroll

					• 15% of his time
3.	Craig Morrison	Vice President of FMS Operations	Springfield, IL	cmorrison@mycil.org (877) 223-7781	• Provides staff and project oversight • 60% of his time during implementation and decrease afterwards
4.	Kelly Brown	Vice President of Administration	Scranton, PA	kbrown@mycil.org (570) 344-7211	• Creation, update and dissemination of outreach and marketing materials, training programs, as well as policy and procedure manuals • Initial staffing of Vermont office as well as ongoing HR needs of office • 25% of her time
5.	William Hann	Vice President and Chief Technology Officer	Scranton, PA	whann@mycil.org (570) 344-7211	• FMS IT operational infrastructure oversight • 15% of his time
6.	Peter Anania	Vice President and Chief Information Officer	Scranton, PA	panania@mycil.org (570) 344-7211	• Responsible for software development, customization and maintenance • 30% of his time
7.	Duane Seidel	Director of Tax – FMS Operations	Scranton, PA	dseidel@mycil.org (570) 344-7211	• Oversight of all taxation and compliance, budget analysis and quality assurance • 50% of his time
8.	Helen Logan	Director of Accounting	Scranton, PA	hlogan@mycil.org (570) 344-7211	• Responsible for billing and accounts receivable • 40% of her time

9.	Diane Alberigi	Director of Payroll Services	Scranton, PA	dalberigi@mycil.org (570) 344-7211	• Oversight of payroll services and related Consumer service • 36% of her time
10.	Kristy Westpfahl Michael	Director of FMS Research and Development	Scranton, PA	kmichael@mycil.org 717-798-4107	• Updating of documents such as policies and procedures, transition plan, and enrollment packets, Support Brokers materials, and training programs • Gathering Program Requirements • 35% of her time during implementation
11.	Emily Miller	Director of Client Care and Training	Tinley Park, IL	emiller@mycil.org 570-335-1608	• Training and quality oversight of all Client (Participant) Care Specialists • Training of all Support Brokerss • 60% of her time during implementation
12.	Mari Pacyna	Director of Finance	Scranton, PA	mpacyna@mycil.org 570-344-7211	• Oversight of accounting and accounts payable • Treasury management • 20% of her time
13.	TBD	Vermont Program Director	Waterbury/ Burlington, Vermont Location	TBD	• Day-to-day communications with Participants, Attendants, Case Managers, and State Program Managers • Assistance in preparation and submission of reports and deliverables • Oversight of Vermont Consumer Care staff and Support Brokers staff

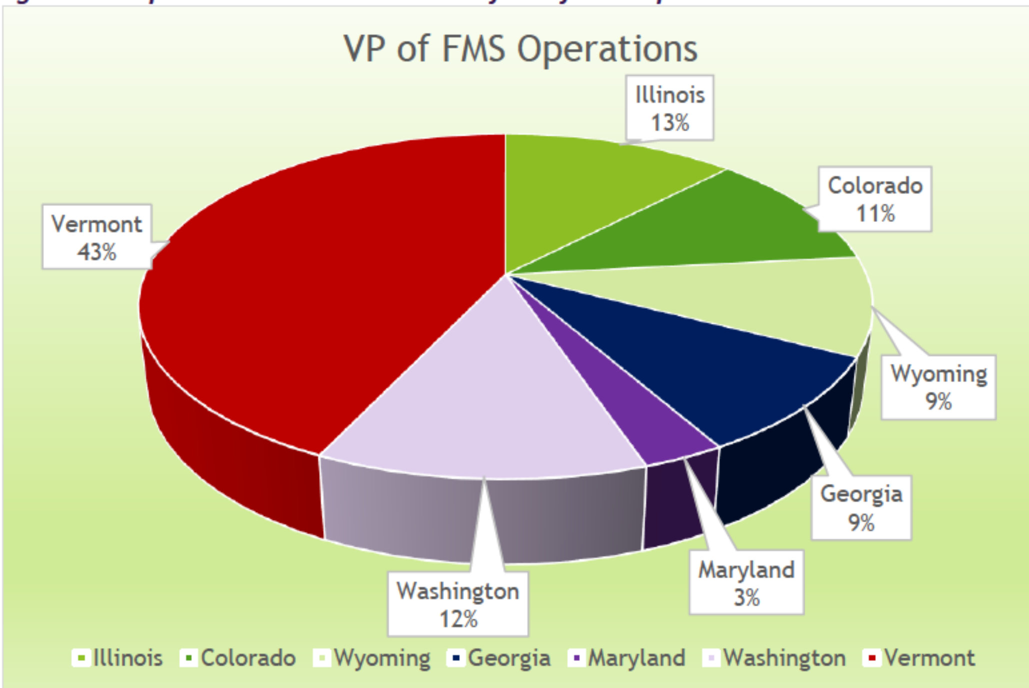
					• Outreach and coordination with community-based organizations. • 100% of their time
14.	TBD	Enrollment and Background Specialists (3)	Waterbury/ Burlington, Vermont Location	TBD	• Enrollments for Vermont Program • Support Brokers tasks • Outreach • Training Participants, Workers and Case Managers • 100% of their time
15.	TBD	Consumer Care Specialists (7)	Waterbury/ Burlington, Vermont Location	TBD	• Consumer Care Service – Vermont • 100% of their time
16.	TBD	1099 Contract Employee(s), as needed	Waterbury/ Burlington, Vermont Location	TBD	• Assist with Enrollments and Transitions, as needed • Percentage of time TBD

While we have provided a high-level description of key staff roles and responsibilities in the table above, we have included a more detailed narrative below for specific ongoing operations staff. Staff utilization not included below are specific Vermont staff, whose utilization is 100% as noted above.

Craig Morrison: Vice President - FMS Operations

Mr. Morrison will direct all Vermont Program Staff. During the first six (6) months, we anticipate Craig will provide approximately forty three percent (43%) of his work hours per month on this contract. After the first six (6) months, this will likely decrease to about 25%. All ACES$ FMS Operations Directors and Managers report directly to Craig. In ***Figure 1*** below, we indicate his utilization percentage for this contract in comparison to other existing contracts.

Figure 1: Proposed Resource Allocation of VP of FMS Operations

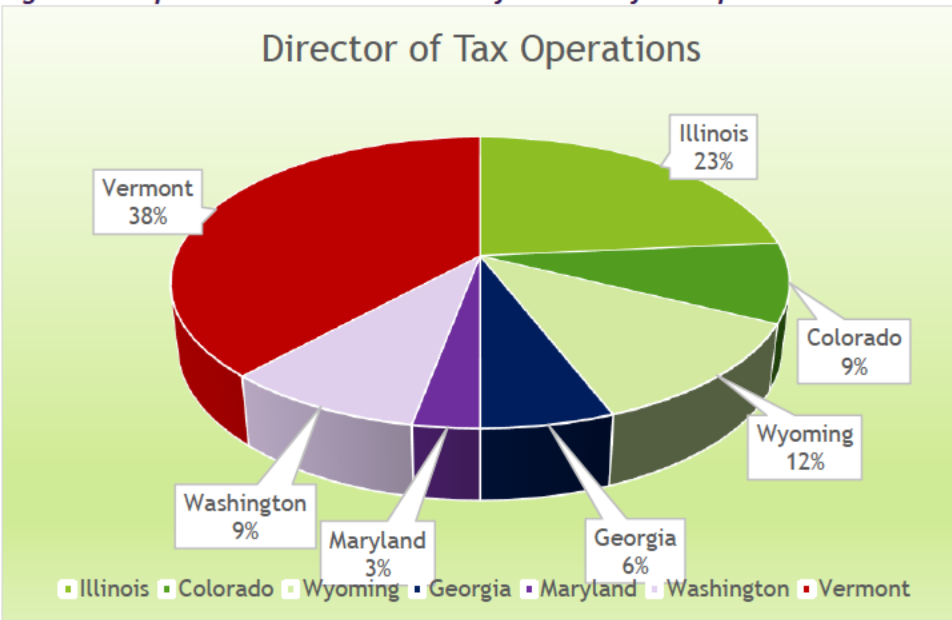


Tax Operations Staff

Director of Tax Operations: Duane Seidel

Mr. Seidel directs the Tax Operations Team. As reflected in ***Figure 2***, during the first six (6) months, we anticipate Duane will provide approximately thirty eight percent (38%) of his work hours per month on this contract. After the first six (6) months, this may decrease to 25-30%.

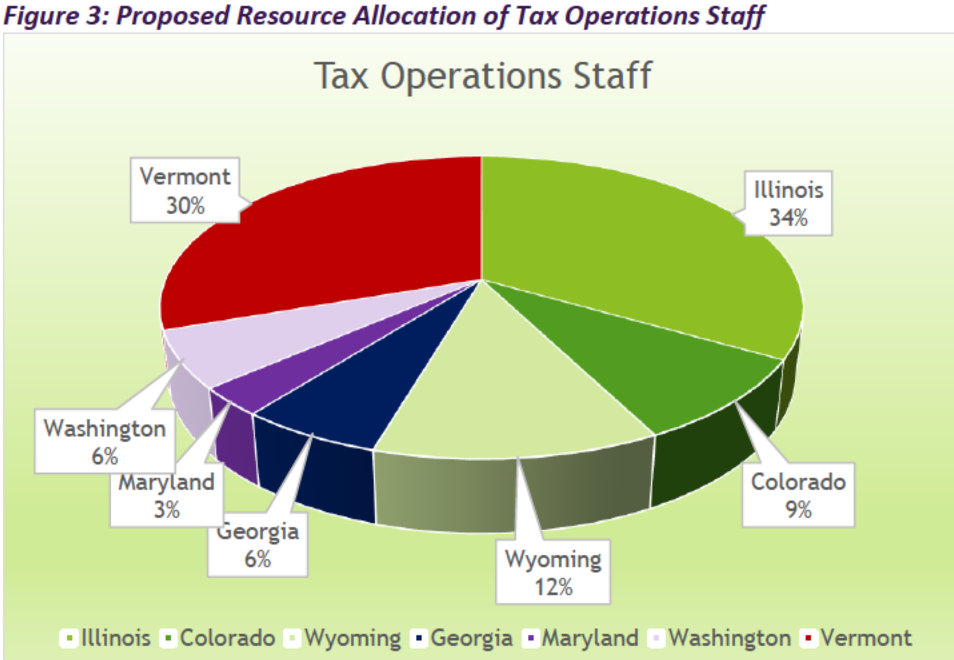
Figure 2: Proposed Resource Allocation of Director of Tax Operations



Tax Operations Staff:

Five (5) Tax Operations staff report to Duane Seidel. They include Supervisors of Budget and Tax, Melissa Lavelle and Andrea Saenz, respectively; two (2) Tax Specialists, Marie Baldwin and Naomi Reynolds; and one (1) Budget Analyst, Jack Grady. These individuals currently work with Illinois, Colorado, Wyoming, Georgia, and Maryland Operations and would work with Vermont as well. We anticipate Vermont would take up approximately 30% of their time (***Figure 3***).

Figure 3: Proposed Resource Allocation of Tax Operations Staff

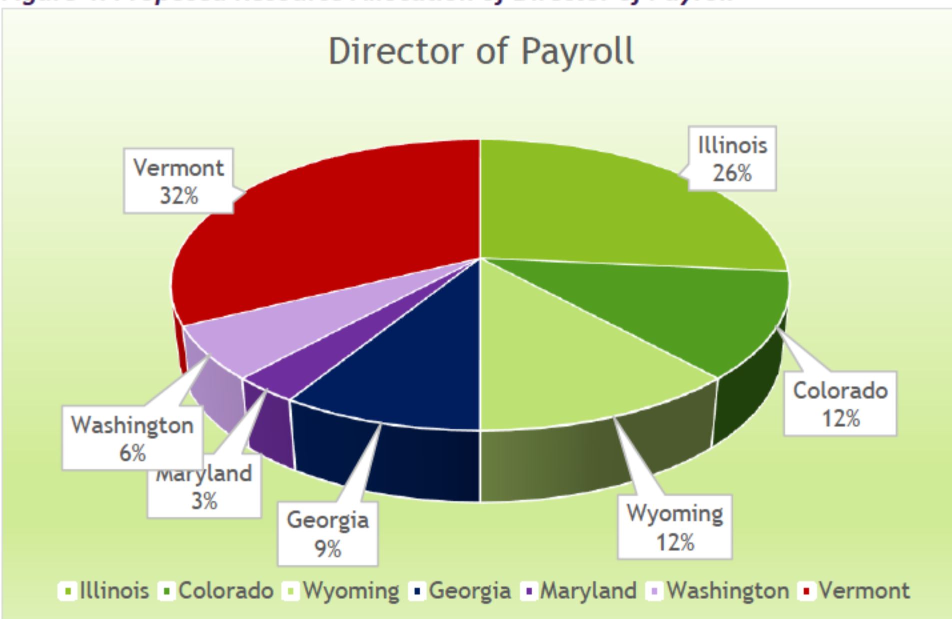


Payroll Staff

Director of Payroll: Diane Alberigi

Diane Alberigi oversees all Payroll staff. During the first six (6) months of this contract, we anticipate Diane will provide approximately thirty two percent (32%) of her work hours per month on this contract as noted in ***Figure 4***. After the first six (6) months, this may decrease slightly to between 25% of her work per month.

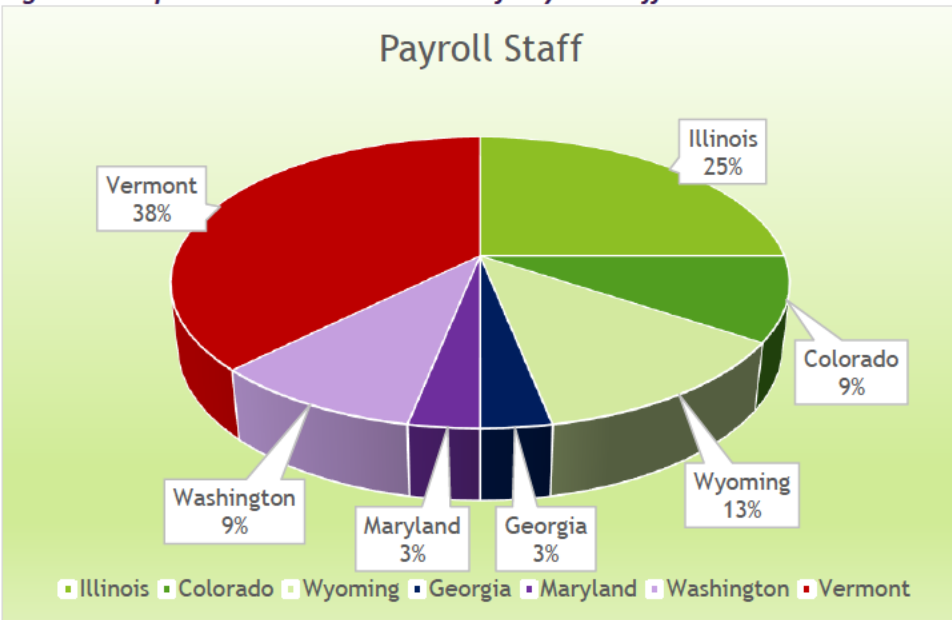
Figure 4: Proposed Resource Allocation of Director of Payroll



Payroll Staff:

There are thirteen (13) payroll staff that report to Diane Alberigi, which includes two (2) Payroll Managers: Kathy Ruane and Valerie Slade; (1) Assistant Payroll Manager: Joanne Ilnicki; two (2) Consumer Care Specialists: Denise Gola and Whitney McDonnell; two (2) Employee Records Specialists: Marcia Crane and Julie Kortawy; and four (4) Payroll Specialists: Bonnie Royce, Jonathan Simpson, Jackie Wilbur and Michael Whitehead. These staff also perform tasks for Illinois, Colorado, Wyoming, Georgia, and Maryland contracts. Vermont will occupy approximately 38% of their time as illustrated in ***Figure 5***. After the first six (6) months, the time allocated with likely decrease to approximately 25-30%.

Figure 5: Proposed Resource Allocation of Payroll Staff

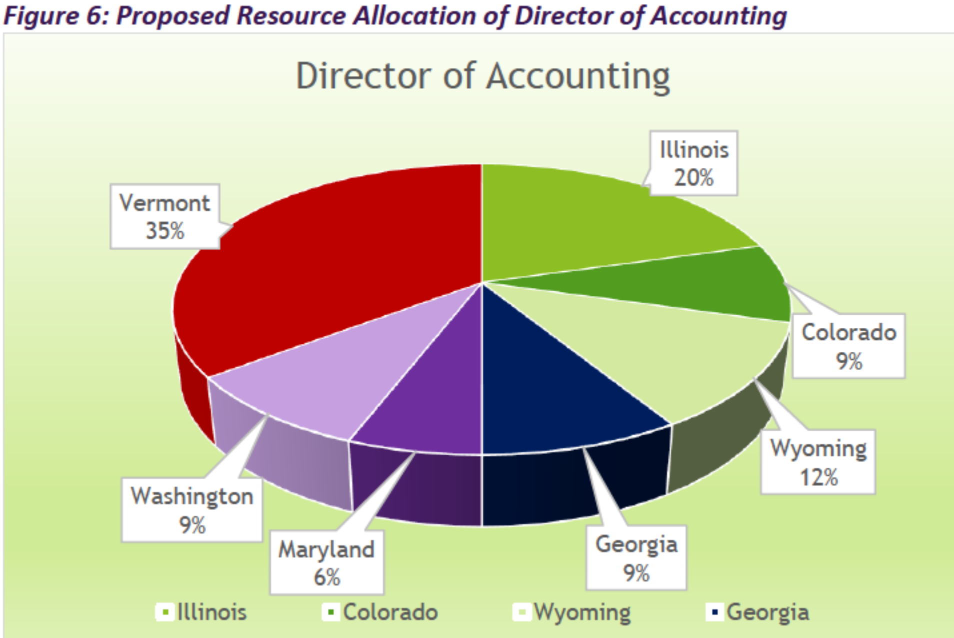


Accounting Staff (Billing and Accounts Receivable)

Director of Accounting: Helen Logan

Helen Logan oversees billing and accounts receivable staff. ***Figure 6*** shows that during the first six (6) months of this contract, we anticipate she will provide approximately thirty five percent (35%) of her work hours per month on this contract. After the first six (6) months, this may decrease slightly to thirty (30%) percent per month.

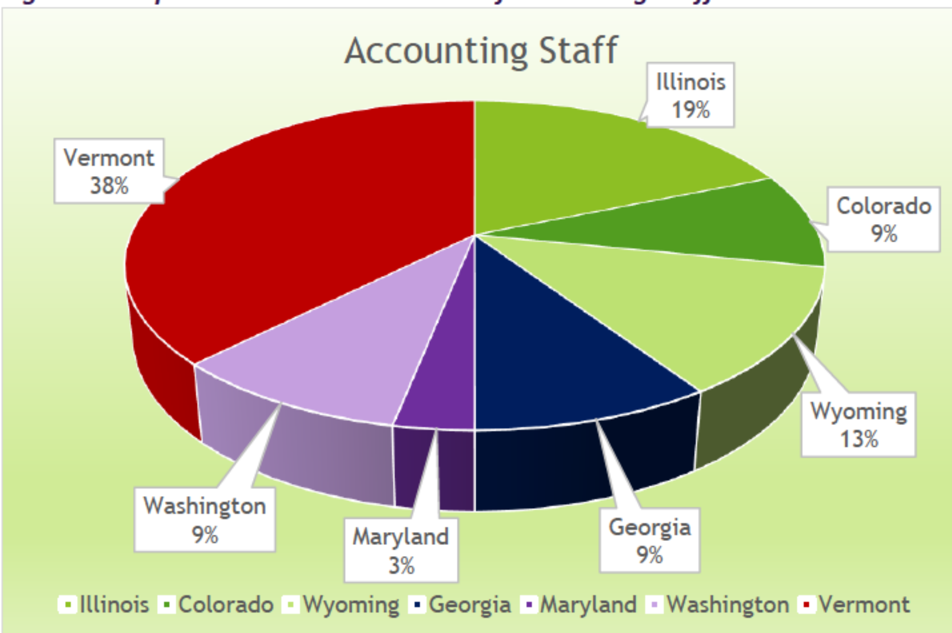
Figure 6: Proposed Resource Allocation of Director of Accounting



Accounting Staff:

Two (2) staff members report to Ms. Logan - Accountants: Jill Crofton and Chuck Hydock. They perform tasks for Illinois, Colorado, Wyoming, Georgia and Maryland contracts. Their work on Vermont would occupy approximately 38% of their time (***Figure 7***) during the first six (6) months and decrease to approximately 30%.

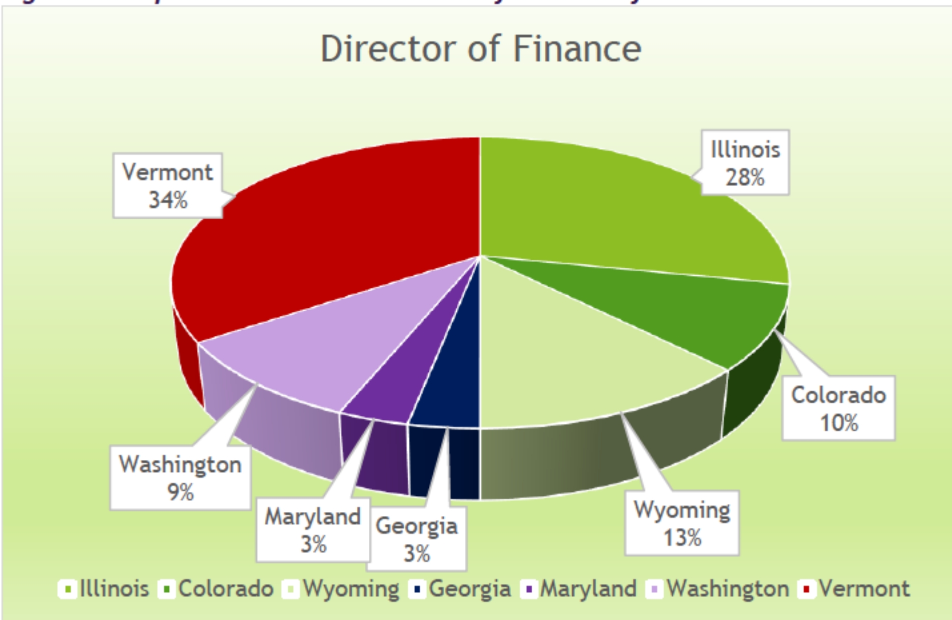
Figure 7: Proposed Resource Allocation of Accounting Staff



Director of Finance: Mari Pacyna

Mari Pacyna oversees accounting, internal payroll, and accounts payable staff. ***Figure 8*** shows that during the first six (6) months of this contract, we anticipate she will provide approximately thirty two percent (32%) of her work hours per month on this contract. After the first six (6) months, this may decrease twenty to twenty (20%) percent per month.

Figure 8: Proposed Resource Allocation of Director of Finance



ACES$ has a growth plan in place that requires us to monitor workflow productivity and the number of Individuals enrolled in the programs we serve. As programs grow, we increase staff accordingly. Additionally, we design internal system efficiencies to improve workflow as needed.

In-State Presence

ACES$ embraces having an in-state presence for all of our contracts. We feel it enables us to establish roots in the states we serve, hire staff that reflect the local communities we serve, and provide higher quality service and training. Currently, ACES$ is anticipating our location to be in Burlington within close proximity to the state office. This office will house the Support Brokers, Consumer Care Specialists, and the Vermont Program Director. If additional Consumer Care or Enrollment Background Specialists become necessary, due to program size and growth, we will increase our staffing accordingly.

We become active members in advocacy groups in each state in which we do business. We are long-time members of SILC (State Independent Living Council) in Pennsylvania. We work closely with the ARC of Illinois and their Caregiver and Family Support Network. They often provide resources, outreach and information on Self-direction.

In Colorado, we are active and regular participants in the Participant–Directed Programs Policy Collaborative (PDPPC). We are also active members of the Colorado Cross-Disability Coalition (CCDC), which advocates for social justice for people with all types of disabilities. Tim Moran, CEO of ACES$, was a keynote speaker during a CCDC symposium on leadership roles for people with disabilities.

If awarded this contract we look to become active members and/or supporters of organizations such as the Vermont Family Network and Vermont's Self-Determination Alliance. We are always looking for opportunities to collaborate with other organizations and advocate for Self-direction and Self-determination.

Our Support Brokers will perform face-to-face enrollments as needed, as well as Employer training and online system training. Our Vermont staff will handle Consumer Care, with information support, whenever needed, from the main headquarters in Scranton. With this arrangement, **ACES$ can quickly augment staff should the program growth rate increase**. ACES$ established satellite locations in Colorado, Wyoming and Georgia, in a matter of weeks, which were fully staffed and running before the required Go-Live date. Experienced ACES$ team members from Scranton, Colorado, Wyoming and/or Illinois will assist with recruitment and training of Vermont staff. Our Burlington office would operate within the business hours of 8:00am to 5:00pm EST.

The offices provide a physical presence for any potential travel-by Participants, community collaborators, and Employees. These offices would be a fully accessible location. As noted above, we plan to have our office located in Burlington. We have already identified several locations within close proximity to the state offices and will sign a lease upon contract award.

Saving energy and promoting sustainability are philosophies underlying all of our locations. This shared belief in sustainability is part of our company's culture as we build in efficiencies to support our program work as well. We take enviornmental impact seriously. (see ***Certificate of Compliance*** provided further along in our proposal.) Our headquarters and sattelite offices have the following in place:

- Computers and monitors turned off overnight and on weekends
- Purchase and activate the "**Energy Star**" energy saving functions available on most company computers and other office equipment. (They are up to 52% more efficient.)
- Lights are on sensors and are off when not in use, and motion detecting switches are in less used areas
- Energy Star rated air conditioning/cooling and climate control is turned off when not needed
- Filtered tap rather than bottled water
- Preference is given to locally manufactured supplies
- Offices recycle paper, plastic and aluminum
- Use email instead of USPS mail whenever possible
- Store electronic reports rather than paper reports
- Use the double-sided feature of printer whenever possible and purchase only recycled paper.
- Use re-manufactured or refillable toner cartridges for printers and photocopiers whenever possible. Color printing used only when needed.
- Light bulbs are energy efficient, lower wattage or compact fluorescents.
- Computer monitors are flat screen as they are more efficient.

- Biodegradable and non-toxic cleaning supplies are used.
- We locate offices within easy access to public transportation such as a bus line to encourage the use of public transit. (Additionally, many of our staff have a disability and this is a critical component to their everyday lives.)

We have targeted the following building as a possible office location, if awarded the contract:

- **The Innovation Center of Vermont**
  128 Lakeside Avenue, Burlington, VT
  - The building is incredibly efficient (99% energy star rating), has full back-up power and offers geo-thermal cooling. It has ample free parking and bus route access, making it a convenient and highly accessible place to work.

As established above, we are easily capable of exceeding expectations set forth ***in RFP Requirement Section 2, U. Vermont Presence.***

Vermont Staff Job Descriptions

We will use the following general job descriptions for recruiting staff for Vermont operations.

Vermont Program Director

GENERAL SUMMARY:
Reporting to the VP – FMS Operations, the Vermont Program Director will provide day-to-day oversight of Vermont operations and serve as the liaison with the State. S/he is responsible for overseeing Support Brokers and Consumer Care specialists for the Vermont Program. This position will be based in our Burlington, VT office.

EDUCATION & WORK EXPERIENCE:

- Associate's or Bachelor's degree in a related field preferred.
- Prior experience in a non-profit or social service environment preferred.

SPECIAL EMPLOYMENT REQUIREMENTS:

- Ability to work independently on assigned tasks.

- Ability to take ownership of projects and see them through from start to finish.
- Excellent communication skills, both verbal and written.
- In-State travel requires valid VT Driver's License and proof of auto insurance.
- Strong organizational skills are necessary.
- Proficiency in MS Word and Excel preferred.

CHARACTERISTIC DUTIES & RESPONSIBILITIES OF JOB:

- Liaison between ACES$, the Program Participants/Employers, their Attendants/Employees and Case Managers.
- Ensures the Participant (and/or their Surrogate) and their Employees receive the necessary training and required paperwork; ensures the proper completion of documents.
- Oversees processes, tracking and forwarding of all incoming Employer and Employee packets.
- Assists with enrollment and customer care questions.
- Ensures completion of all Employer and/or Employee enrollment packets. Issue start dates for Employees to Case Managers.

Consumer Care Specialists

GENERAL SUMMARY:

Reporting to the Vermont Program Director, the Consumer Care Specialist will provide clerical support, phone assistance and inquiry resolutions to new and existing clients regarding financial management services. These positions to be based in our Burlington, VT office.

EDUCATION, EXPERIENCE & PERSONAL CHARACTERISTICS:

We seek individuals with a high school diploma or general education degree (GED).

These positions requires a minimum of 1-year administrative experience (preferably in a non-profit or social service environment) and/or experience in a call center environment.

These positions requires excellent verbal and written communications skills. The successful candidates will have the ability to work independently on assigned tasks. Proficiency in MS Word and Excel is preferred.

CHARACTERISTIC DUTIES & RESPONSIBILITIES OF JOB:

The successful candidate will receive incoming phone calls and respond in an efficient, professional and caring manner. S/he will participate in our client service phone queue and will be accountable for maintaining a 95% or higher call retrieval rate.

These position responsibilities include, but are not limited to, the coordination of departmental and participant correspondence, maintenance of client information, as well as the department calendar. This individual will input case note information into the computer database each time there is contact with consumers. The successful candidate will be responsible for the coordination of informational materials for distribution to consumers, social service agencies and interested individuals in the community.

Support Brokers

GENERAL SUMMARY:

Reporting to the Vermont Program Director, the Support Broker is responsible for the initial coordination of fiscal required paperwork to begin consumers on the various waiver programs. Additionally, they are responsible for providing skills training for employers, in a variety of mediums (e.g. on line, in writing, in-person, etc.) to assist them to learn and to carry out their responsibilities as employers. These positions are to be in our Burlington, VT office.

EDUCATION & WORK EXPERIENCE:

- Minimum high school diploma or general education degree (GED).
- Associate's or Bachelor's degree in a related field preferred.
- Prior experience preferably in a non-profit or social service environment.

SPECIAL EMPLOYMENT REQUIREMENTS:

- Ability to work independently on assigned tasks. Excellent communication skills both oral and written.
- Positive interpersonal skills required.
- Capability for extensive travel.
- Valid VT Driver's License.
- Proof of auto insurance.
- Excellent organizational skills required.

CHARACTERISTIC DUTIES & RESPONSIBILITIES OF JOB:

Estimated Percent of Time	***Essential Elements of Position***
40%	The successful candidate will travel to meet Participants for enrollments, when necessary. Rental car provided when traveling distances greater than 125 miles round trip. Transmits all necessary paperwork to the Pennsylvania payroll department for internal processing. Also responsible for the input, tracking and reporting of all contractual background check information, and provision of skills training for employers, in a variety of mediums (e.g. on line, in writing, in-person, etc.) to assist them to learn and to carry out their responsibilities as employers.

40%	Follows through with service orders. Provides to the Participant, and /or their assigned representative, the necessary training, required paperwork, and ensures the proper completion of documents. Delivers all necessary paperwork to the Processing Clerk for internal processing.
5%	Updates required forms according to program changes. Responsible to research guidelines when changes occur. Informs other supporting staff of all required changes.
5%	Maintains consumer database and updates the information accordingly. Networks with various agencies to keep established relationships.
Estimated Percent of Time	***Other Elements***
5%	Responsible for providing proper supplies to Participants. Updates information packets as needed.
5%	Participates in customer-service phone queue. Accountable for maintaining 95% or higher call retrieval rate.

The above statements reflect the general duties considered necessary to describe the main functions of the position and should not be considered the detailed listing of all the job requirements that may be part of the position.

Staff Acquisition Strategy

Upon Contract award, we will recruit for the following positions:

- Vermont Program Director
- Support Brokers (3)
- Consumer Care Specialists (7)

We have position descriptions already developed for these staff roles. In our experience, hiring individuals with Case Management or Social Services backgrounds has been a successful strategy. Many understand the fundamentals of why we provide these services and enjoy interaction with the Participants. To us that is important. We use Indeed.com, SocialService.com, and Monster.com as online recruitment tools. We would also use vermontjoblink.com.

Staff Training Plan

ACES$ requires all new employees to attend a weeklong training on program requirements, roles and responsibilities (both internally and within the program), systems, Self-direction, consumer care/customer service and working with individuals with disabilities. Staff receiving training will include Program Director, Support Brokers and Consumer Care Specialists. We have found in-person training gives our staff a clear understanding of:

- Our mission as a CIL and an FMS provider;
- The importance of promoting self-direction and informed choice; and
- How our organization works on a more intimate level.

It also helps our staff to develop relationships and connections within our organization and key departments with which they will be working. Our satellite offices are part of the team.

Training will include:

- Program Review
- Orientation and navigation of PAID, our payroll system
- Orientation and navigation of NOTE, our billing system
- Billing
- Enrollment Packets
- Consumer Care/Customer Service
- HIPAA and Information Handling
- Internal Policies and Procedures
- Participant-Direction
- Sensitivity and Awareness training

Key Staff to conduct training include:

- Emily Miller, Director of Client Care and Training
- Kristy Michael, Director of Research and Development
- Diane Alberigi, Director of Payroll
- Kelly Brown, VP of Administration
- Craig Morrison, VP of FMS Operations

Curricula and Training Materials

We have outlined the training curricula, materials used, instructors and general schedule of training below in ***Table 3.*** We will integrate any DAIL training requirements into the ACES$ training plan, as needed. This may mean cross-training opportunities with DAIL staff to review roles and responsibilities.

Table 3: Training Schedule

Training Curricula/Topic	Training Materials	Instructor(s)	Schedule	Description
Program Review	• Program Policy Manuals/Handbooks • Program Summary Spreadsheet • Program Overview Power Point	• Emily Miller, Director of Training and Consumer Care • Kristy Michael, Director of Research and Development	Day 1, Morning 9:00 - 11:00	All new staff, along with all current staff assigned to the contract, will participate in a "getting to know the program" presentation and training. During this training, we review the scope of the services, requirements that affect FMS, resources to reference, and an overview of the population served.
Orientation and navigation of PAID, our payroll system	• PAID Navigation Cheat Sheet • PAID System	• Tamara Moore, Consumer Care Training Specialist • Diane Alberigi, Director of Payroll	Days 1,2,3,4,5, 12:30 - 4:00	All new staff will participate in afternoon trainings on PAID and NOTE interchangeably. Each day trainers will build on system knowledge and complexity of test case data and scenarios.
Orientation and navigation of NOTE, our billing system	• NOTE Navigation Cheat Sheet • NOTE System	• Tamara Moore, Consumer Care Training Specialist • Diane Alberigi, Director of Payroll	Days 1,2,3,4,5, 12:30 - 4:00	All new staff will participate in afternoon trainings on PAID and NOTE interchangeably. Each day trainers will build on system knowledge and complexity of test case data and scenarios.
Billing	• ACES$ Billing 101 Power Point	• Emily Miller, Director of	Day 2, Morning 9:00 - 10:00	New Support Brokers staff and Consumer Care Specialists will

		Training and Consumer Care • Helen Logan, Director of Billing and Accounts Receivable		participate in a brief overview of how information flows from PAID into our Billing processes and get to know our billing staff.
Enrollment Packets	• ACES$ Enrollment Packet • Corresponding Systems • PRM (PAID Resource Management System) records information and interactions with Participants, Employees, and Supports Coordinators	• Diane Alberigi, Director of Payroll	Days 3, 4 Morning 9:00 - 10:30	New Support Brokers staff and Consumer Care Specialists will participate in a review of Enrollment Packet requirements, processing and training needs for Participants and Employees, and instruction on using PRM.
Consumer Care/Customer Service	• ACES$ Enrollment Packet • Corresponding Systems • PRM (PAID Resource Management System- records information and interactions with	• Emily Miller, Director of Training and Consumer Care	Days 3, 4 Morning 10:30 - 12:00	New Support Brokers staff and Consumer Care Specialists will participate in a review of Enrollment Packet requirements, processing and training needs for Participants and Employees, Consumer Care best practices and instruction on using PRM

	Participants, Employees, and Supports Coordinators			
HIPAA and Information Handling	• ACES$ HIPAA and Information Handling, A How-To Guide Power Point • ACES$ Employee Handbook	• Emily Miller, Director of Training and Consumer Care • Kelly Brown, VP of Administration	Day 2, Morning 10:00 - 11:00	All new staff will participate in a review of HIPAA requirements and secure information handling processes
Internal Policies and Procedures	• ACES$ Polices and Procedure Document • ACES$ Employee Handbook	• Emily Miller, Director of Training and Consumer Services • Kelly Brown, VP of Administration	Day 2, Morning 11:00 - 12:00	All new staff will participate in a review of general internal policies and procedures. Breakouts will occur as needed to provide detail based on job description.
Participant-Direction	• ACES$ Participant Direction Power Point and Online Training	• Emily Miller, Director of Training and Consumer Services • Kelly Brown, VP of Administration	Day 5, Morning 9:00 – 12:00	All new staff will participate in a review of what is Participant Direction, which includes a discussion of participant direction philosophy, roles and responsibilities, role-play, and online training.

		• Keith Williams, Advocacy Coordinator		
Sensitivity and Awareness training	• ACES$ Employee Handbook • Instructor Led discussion and Panel discussion	• Emily Miller, Director of Training and Consumer Services • Kelly Brown, VP of Administration • Keith Williams, Advocacy Coordinator • Additional CIL Staff as available	Day 5, Afternoon 12:30 - 2:00	All new staff will participate in an active discussion on sensitivity and Awareness training. As a CIL, we take this very seriously and are able to have our own staff engage in a lively conversation with new staff on how to interact with internal staff as well as participants in the program.

Following the weeklong introductory training, Consumer Care Specialists will begin a weeklong secondary training where they will participate in role-playing and finally live calls with follow up analysis after each call provided by Emily Miller, Director of Training and Consumer Services, and Tamara Moore, Client Care Training Specialist.

Similarly, the Support Brokers will then commence in a more detailed weeklong instruction of Support Brokers functions, expectations, monitoring requirements and use of tools. **Table 4** provides a detailed schedule and curriculum.

Instruction will include role-play breakouts for each tool/document after its initial instruction. At the end of the week, we will have breakout scenarios, allowing for several complete run-throughs of the Support Brokers functions, documents and toolkits via the use of detailed scenarios.

Table 4: Support Brokers Training

Training Curricula /Topic	Training Materials	Instructor(s)	Schedule	Description
Enrollment Packets Introduction	• Employer Enrollment Packet • Employee Enrollment Packet • Vendor Enrollment Packet	• Diane Alberigi, Director of Payroll • Kristy Michael, Director of Research and Development	Day 1, Morning 9:00-12:00	Support Brokers will receive instruction on each packet and how they are processed
Enrollment Packets Role-play	• Employer Enrollment Packet • Employee Enrollment Packet • Vendor Enrollment Packet	• Diane Alberigi, Director of Payroll • Kristy Michael, Director of Research and Development •	Day 1, Afternoon 1:00-4:00	Support Brokers will breakout into pairs and receive a scenario. The Support Brokers will take turns playing the role of the Support Broker and Participant as they fill out each packet as per the scenario. Question and Answer period.
Background checks and Certification Requirements	• Background check forms	• Kristy Michael, Director of Research and Development	Day 2, Morning 9:00 - 9:30	Detailed review of correct information gathering and processing procedures for background check

		• Craig Morrison, VP FMS Operations and COO		documents and certifications, review of program specific barrier crimes, Question and Answer period
Payroll Schedule and Timesheets	• Payroll Schedule • Timesheets	• Craig Morrison, VP FMS Operations and COO • Diane Alberigi, Director of Payroll	Day 2, Morning 9:30 - 10:30	Detailed review of payroll schedule, correct method for completing timesheets, reasons for kick outs, methods for processing, commonly asked questions
Rate Calculator and "Cost to You" Worksheet	• Rate Calculator • "Cost to You" Worksheet	• Craig Morrison, VP FMS Operations and COO • Diane Alberigi, Director of Payroll	Day 2, Morning 10:45-12:00	Detailed review of Rate Calculator and "Cost to You" Worksheet including correct method for completing worksheets and commonly asked questions. Scenarios with role-play breakouts following instruction
Scheduling, Task and Job Description Toolkit	• Scheduling, Task and Job Description Toolkit	• Kristy Michael, Director of Research and Development • Emily Miller, Director of Training and Consumer Services • Kelly Brown, VP of Administration	Day 2, Afternoon 1:00 – 2:00	Detailed review of Scheduling, Task and Job Description Toolkit including correct method for completing worksheets and commonly asked questions. Scenarios with role-play breakouts following instruction
Back-up Plan Toolkit	• Back-up Plan Toolkit	• Kristy Michael, Director of Research and Development	Day 2, Afternoon 2:00 – 3:00	Detailed review of Back-Up Plan Toolkit including correct method for completing worksheets and commonly asked questions. Scenarios with

		• Emily Miller, Director of Training and Consumer Services • Kelly Brown, VP of Administration		role-play breakouts following instruction
Introduction to Online Training Tools and Paper Manuals	• Online Training Tools and Paper Manuals	• Kristy Michael, Director of Research and Development • Emily Miller, Director of Training and Consumer Services	Day 2, Afternoon 3:15 – 4:15	Overview of Training Modules, Topics Covered and Format including alternate format provision and tracking requirements. Review of variations across programs
Training Module I: Making it Happen - Arranging for Services, Supports and Goods	• Module I: Making it Happen - Arranging for Services, Supports and Goods	• Kristy Michael, Director of Research and Development • Emily Miller, Director of Training and Consumer Services	Day 3, Morning 9:00 – 10:00	Detailed review of Module I, including: • Introduction to Self-direction • How to hire help • Hiring: what to ask • What rate to pay • Wages: responsible budgeting • How to find a worker • Hiring family members: what to ask Discussion and commonly asked questions throughout
Module II: Enrollment Process and Packets	• Module II: Enrollment Process and Packets	• Kristy Michael, Director of Research and Development	Day 3, Morning 10:00 – 11:00	Detailed review of Module II, including: • Who is the Support Brokers? • Enrollment Process and Timeline

		• Emily Miller, Director of Training and Consumer Services		• Enrollment Packets Discussion and commonly asked questions throughout
Module III: Timesheet Submission, Payroll and Ongoing Budget Management	• Module III: Timesheet Submission, Payroll and Ongoing Budget Management	• Kristy Michael, Director of Research and Development • Emily Miller, Director of Training and Consumer Services	Day 3, Morning 11:00 – 12:00	Detailed review of Module III, including: • What is the "payroll schedule"? • What if I am late and miss the pay period deadline? • What is "supplemental pay"? • Difference between submitting by mail, fax, email and online timesheets • How to submit by mail, fax, email • How to submit through the online portal • How my hourly rate may be impacted by overtime and taxes/withholdings • Correcting timesheets • Submitting only for hours worked Discussion and commonly asked questions throughout
Module IV: Self-direction Goods and Services	• Module IV: Self-direction Goods and Services	• Kristy Michael, Director of Research and Development • Emily Miller, Director of Training and	Day 3, Afternoon 1:00 – 2:00	Detailed review of Module IV, including: • How to purchase and submit receipts/invoices for goods and services

		Consumer Services		○ What items are typically allowed under the program? ○ Who is approved to purchase goods or services? ○ Working with my Case Manager to create a Plan that includes the goods and services I need ○ How to purchase items on my approved Plan ○ How to submit receipts and requests for reimbursement ○ When do I use a vendor? ○ Vendor paperwork Discussion and commonly asked questions throughout
Module V: Fraud, Abuse and Grievances	• Module V: Fraud, Abuse and Grievances	• Kristy Michael, Director of Research and Development • Emily Miller, Director of Training and Consumer Services	Day 3, Afternoon 2:00 – 3:00	Detailed review of Module V, including: • What is fraud? • What is abuse? • How to report it and who you can turn to • What is a grievance? • How to report it and get resolution Discussion and commonly asked questions throughout

Module VI: Health, Safety and Training	• Module VI: Health, Safety and Training	• Kristy Michael, Director of Research and Development • Emily Miller, Director of Training and Consumer Services	Day 3, Afternoon 3:00 – 4:00	Detailed review of Module V, including: • What types of training does my employee need? • Where do they get training? • Is training required? • Health and Safety in the workplace Discussion and commonly asked questions throughout
Recap Of Materials, Processes, Requirements and Tools	• PowerPoint Overview	• Kristy Michael, Director of Research and Development	Day 4, Morning 9:00 – 9:30	Brief overview of materials reviewed throughout the week and their purpose
Role Play	• Role Play Scenarios	• Kristy Michael, Director of Research and Development • Emily Miller, Director of Training and Consumer Services •	Day 4, Morning 9:30 – 12:00	Role Play Scenarios 1 and 2. Support Brokers pair off and work through complete scenarios using all tools and processes
Role Play	• Role Play Scenarios	• Kristy Michael, Director of Research and Development • Emily Miller, Director of Training and Consumer Services •	Day 4, Afternoon 1:00 – 4:00	Role Play Scenarios 3 and 4. Support Brokers pair off and work through complete scenarios using all tools and processes
Role Play	• Role Play Scenarios	• Kristy Michael,	Day 5, Morning	Role Play Scenarios 5 and 6. Support Brokers

		Director of Research and Development • Emily Miller, Director of Training and Consumer Services	9:00 – 12:00	pair off and work through complete scenarios using all tools and processes
Q&A and additional assistance	• Open Discussion	• Kristy Michael, Director of Research and Development • Emily Miller, Director of Training and Consumer Services	Day 5, Afternoon 1 – 2:30	Open-ended question and answer period, additional assistance provided as separate breakouts for problem areas or additional tool assistance

Organizational Charts

We have provided organizational charts below as ***Figures 10 - 14***. These charts outline the hierarchy and reporting structure of the staff noted above.

Figure 9: Key Project Staff-Organization Chart

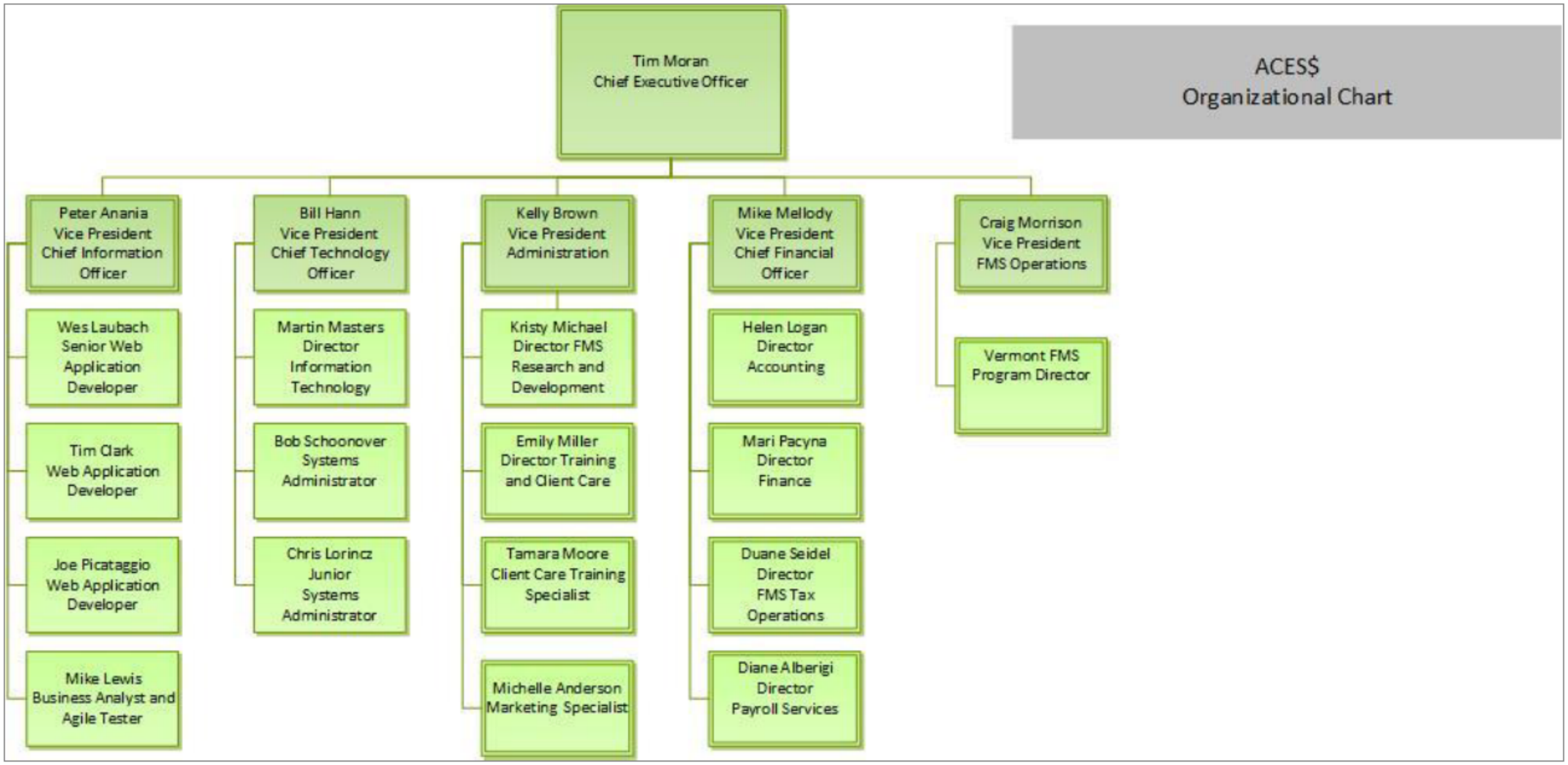


Figure 10: Vermont Staff-Organization Chart

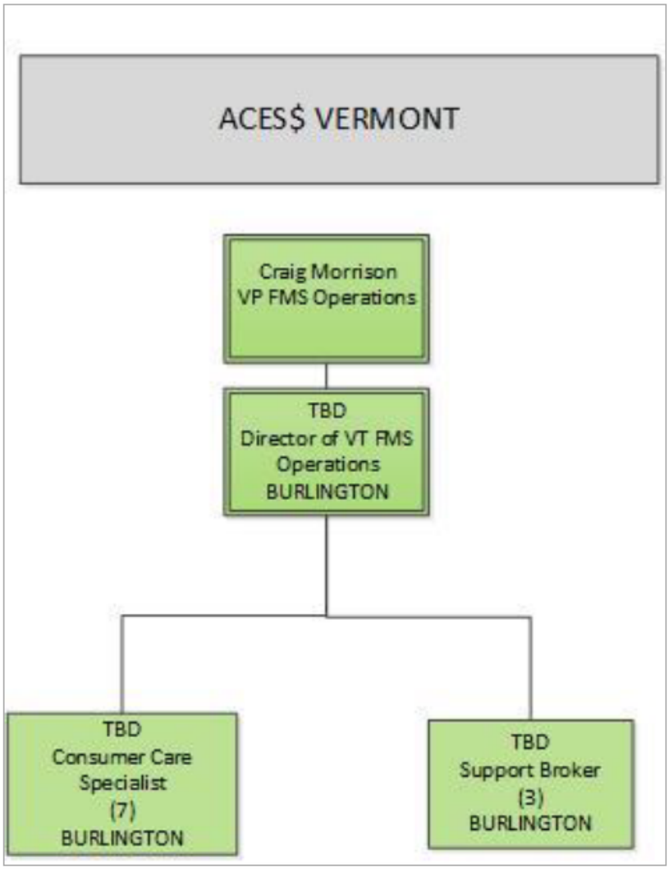


Figure 11: Finance, Accounting and Accounts Payable

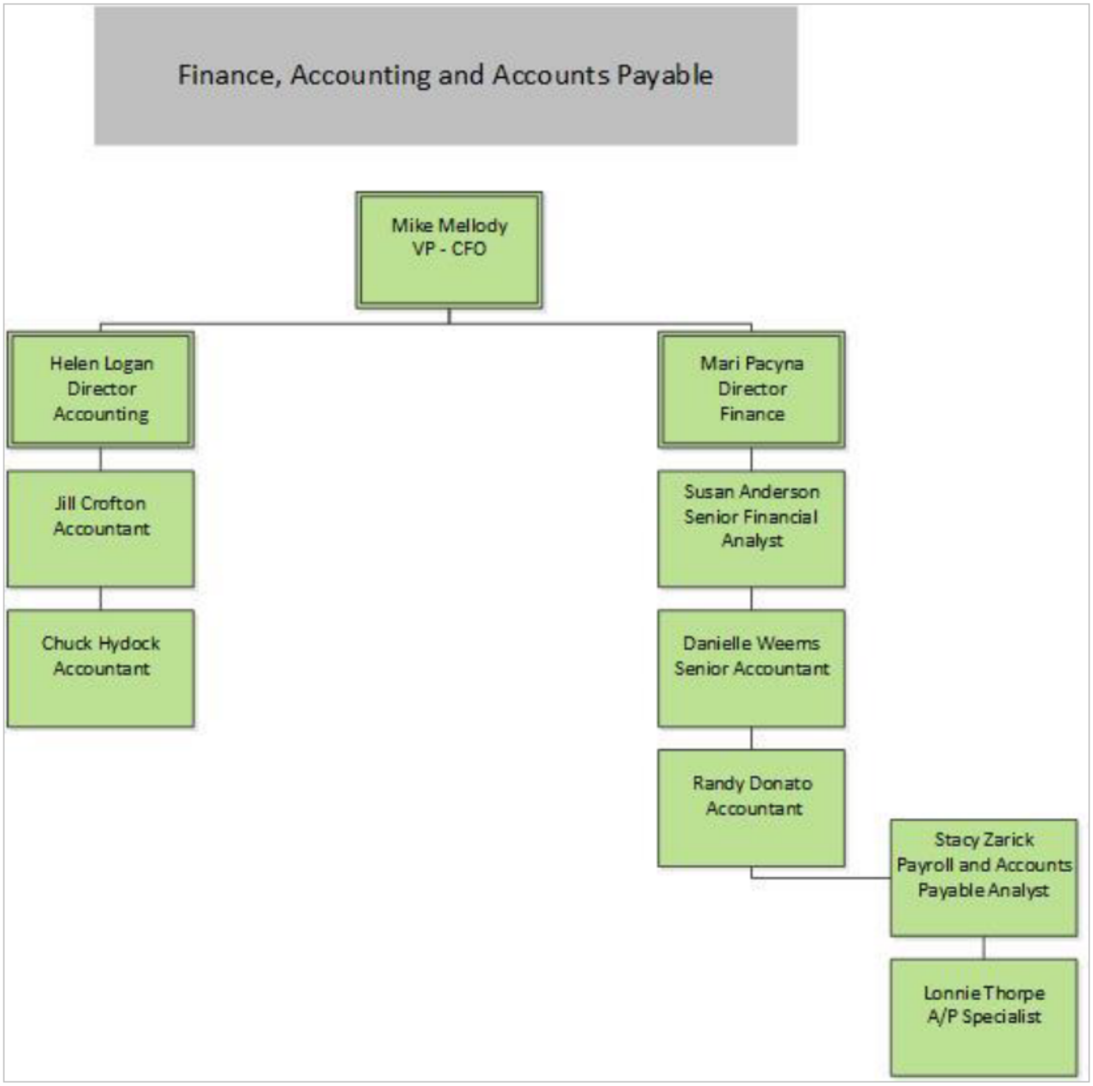


Figure 12: Tax Department

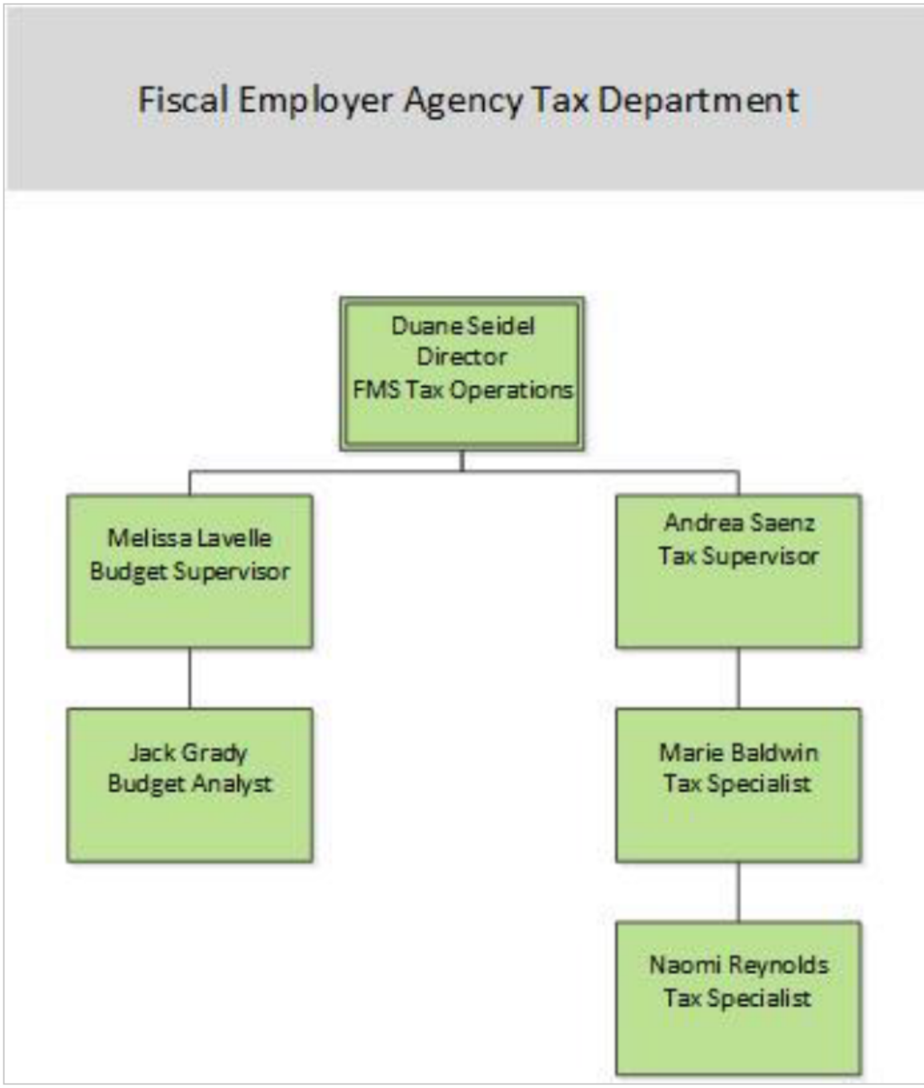
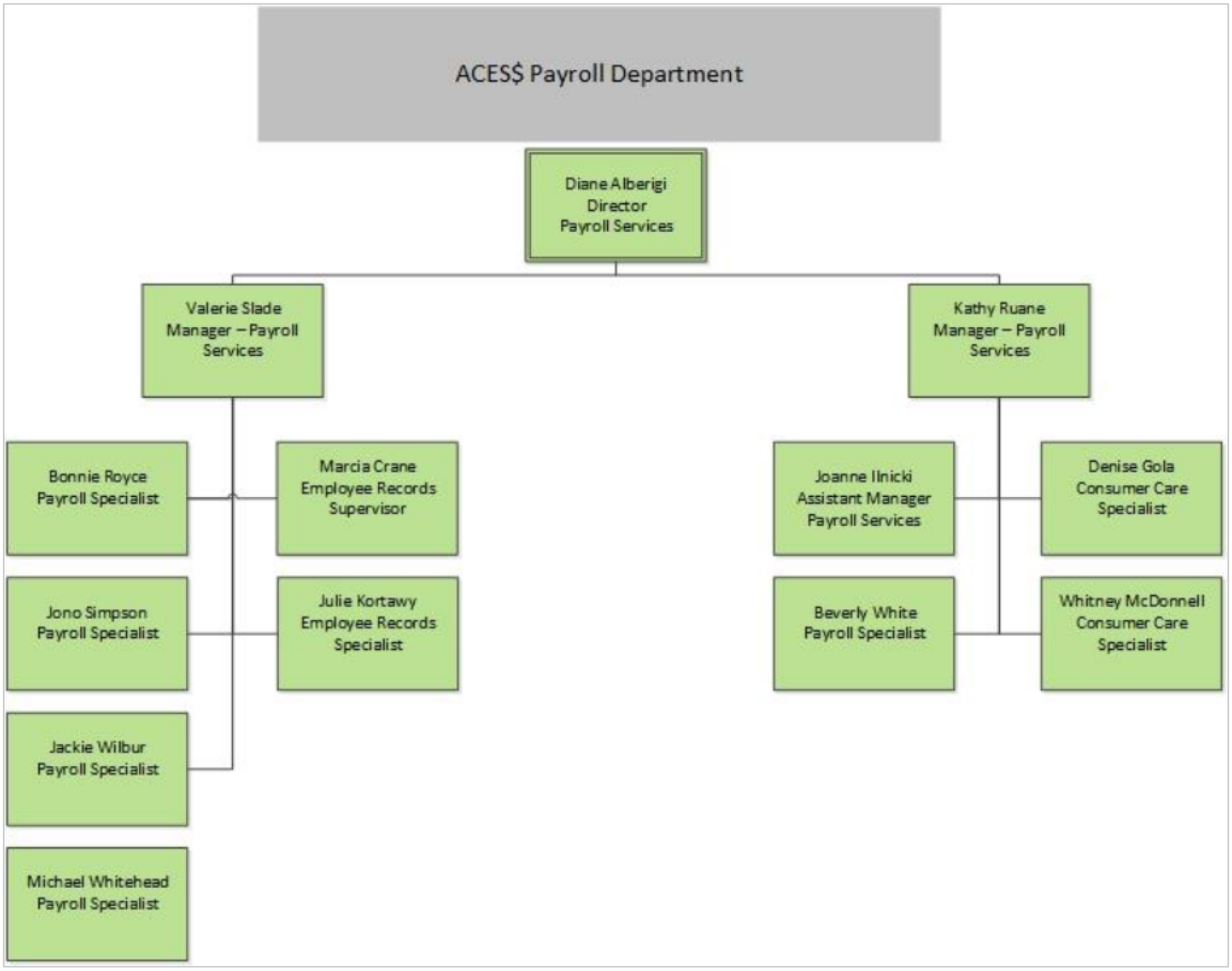


Figure 13: Payroll Department



Short Key Staff Biographies

Tim Moran, Chief Executive Officer of the Northeast PA Center for Independent Living CIL/ACES$ Financial Management Services since July 2012, oversees every operational aspect of the business. Through Tim's leadership ACES$ has experienced tremendous growth. This is a direct result of his implementation of leaner, more efficient processes and state-of-the-art technologies. Prior to his appointment as CEO, Mr. Moran was President of the CIL/ACES$ Board of Directors. His previous business experience includes Director of Business Development with a leading manufacturer of prosthetics, and positions with the Treasury Department of the Commonwealth of Pennsylvania. Tim has a B.A. in Business Administration and is currently pursuing his Master's in Business Process Management with an emphasis in healthcare.

Michael Mellody, CFO, has been with CIL/ACES$ since 2016. As Vice President and Chief Financial Officer, Mr. Mellody has responsibility for the full scope of accounting functions to include payroll, A/P & A/R (accounts payable and receivable), tax reporting, general ledger, cash flow and budgeting for agency and individual programs. Mike is a Certified Public Accountant, with twenty years of experience in corporate finance and accounting. During his first year at CIL/ACES$, Mike has made significant contributions to our automated accounting and payroll systems, as well as our staffing model, to significantly enhance accuracy and productivity. Mike has his B.S. in Accounting; is a member of AICPA and PICPA.

Craig Morrison, Vice President – FMS Operations for ACES$, has overseen the staff and the day-to-day operations of ACES$ since 2009. Prior to joining ACES$, Mr. Morrison spent twenty two (22) years in the military retiring as State Senior Human Resource Sergeants Major and has a B.A. degree. Under his leadership, ACES$ continues to grow and exceed industry standards of quality. Craig's emphasis on customer service is a key contributor to the success of ACES$ and our satisfied Consumers.

Kelly Brown, ***proud graduate of the University of Vermont, Class of 1986. Go Catamounts!*** Kelly is Vice President of Administration for CIL/ACES$. She has been with CIL/ACES$ since 2013, and has responsibility for human resources, marketing, communications and administration for the organization. Ms. Brown has a Bachelor of Science degree and is a SHRM-CP. She began her career in executive search and human resources and has most recently worked in strategic marketing and advertising. She has a great deal of consumer service experience which enables her to be highly effective in the CIL/ACES$ client care-oriented culture. Kelly will play a major role in staffing as well as the creation of outreach materials, and policy and procedure manuals.

Duane Seidel, Director, FMS Tax Operations for ACES$, is a Certified Payroll Professional (CPP) with the American Payroll Association since 2005. He has been with CIL/ACES$ since 2007. Mr. Seidel has prior accounting experience with another Center for Independent Living as well as with a manufacturing concern. He earned his B.S. in Business and Accounting as well as a Master's in Business Administration. Duane's extensive experience working with persons with disabilities combined with his encyclopedic knowledge of tax issues and payroll systems contribute to his ability to provide outstanding service to Consumers.

Helen Logan, Director of Accounting for CIL/ACES$ has fourteen (14) years of accounting experience, five (5) years with accounting firms and nine (9) years with CIL/ACES$. Ms. Logan earned her B.S. in Accounting, Magna Cum Laude. Helen prepares complex financial reports and conducts ongoing research regarding financial laws, regulations and policies specific to persons with disabilities. Helen has responsibility for ACES$ billing for all states and programs, as well as accounts receivable.

Mari Pacyna is Director of Finance for CIL/ACES$. Mari joined the team in 2016 and has responsibility for our accounting and accounts payable functions. She has 28 years of experience in both public accounting and corporate financial management. Mari's ability to streamline operations has enabled our finance staff to be more focused and specialized. Mari has her B.S. in Accounting.

William Hann is Vice President and Chief Technology Officer for CIL/ACES$. Mr. Hann has sixteen (16) years of experience building and supporting business information, technology architecture within the banking, media and manufacturing sectors. Along with being a Microsoft Certified Professional (MCP), he holds a Bachelor of Arts. William's passion for the latest, most efficient and economically responsible technologies made an immediate and positive impact on all of CIL/ACES$ since joining in 2014.

Peter Anania is Vice President and Chief Information Officer for CIL/ACES$ since 2014. Before joining CIL/ACES$, Mr. Anania spent years in web application development for the financial services and healthcare industries. He and his team are responsible for our propriety software programs, PAID and NOTE, as well as the development and management of all of our software programs. As we strive for excellence, Peter stays on the cutting edge of technological advancements enabling CIL/ACES$ to be at the forefront of our industry. He holds the following educational degrees: B.S. in Ceramic Science and Engineering, B.S. in Information Technology, M.S. in Software Engineering, and M.B.A. in Management Information Systems.

Diane Alberigi, Director of Payroll Services for ACES$, has been with the organization since 2007. Ms. Alberigi spent 30 years in the insurance industry prior to joining ACES$. The payroll Department has flourished under her supervision. When she began, the Department issued 2,900 checks semi-monthly and currently issues 11,000 semi-monthly. Diane is a Certified Payroll Professional (CPP). It bears mention that three (3) payroll staff members are also Fundamental Payroll Certified (FPC). ***Diane was a recently awarded the 2017 Excellence in FMS Payroll Award from NRCPDS, Applied Self Direction. This award was highly competitive across all members and both peers in the FMS vendor industry and State Representatives chose her. Diane received this award based on her level of dedication to quality control and her personal connections and commitment to the Participants we serve.***

Emily Miller, Director of Training and Client Care, is a self-direction and person-centered approach specialist, as well as a SAGECare Certified Trainer. As such, Emily ensures ACES$ employees receive culturally competent service learning. Ms. Miller joined the ACES$ team in 2017, after working with the organization as a consultant to develop FMS online, self-direction training programs. Prior to joining ACES$, Ms. Miller was a Care Consultant with the Alzheimer's

Association National Office. Emily spent three years at the Maryland Department of Aging as an Aging and Disability Resource Center Program Manager, with extensive experience in Options Counseling. Ms. Miller actively works on client care/customer service monitoring, quality assurance, training program development and implementation, as well as the creation of learning opportunities for the entire organization.

Kristy Westpfahl Michael, Director of FMS Research and Development, joined the ACES$ team in 2015, after more than eight years of working with ACES$ as a consultant on FMS development, program policy and implementation. Prior to joining ACES$, she was an Associate with HCBS Strategies, a national consulting firm specializing in building home and community-based supports. During her time with HCBS Strategies, Kristy worked with a number of states including Vermont, Alaska, the District of Columbia, Maryland, Minnesota, Colorado and Illinois. Kristy's projects have included developing Options Counseling materials and tools, QA/QI, VD-HCBS, Cash and Counseling, Community First Choice, Nursing Home Transitions, Balancing Incentive Program, Money Follows the Person, and other Consumer-directed programs. She has worked with several states under various initiatives such as Federal Systems Change, Enhanced ADRC, and Options Counseling efforts.

Résumés:

Resumes for Key Staff are on the following pages.

ACES$ FINANCIAL MANAGEMENT SERVICES
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Timothy J. Moran

Biography

Tim Moran, Chief Executive Officer of the Center for Independent Living (CIL) /ACES$ since July 2012, oversees every operational aspect of the business. Through Tim's leadership, ACES$ has experienced tremendous growth; a direct result of his implementation of leaner, more efficient processes and state-of-the-art technologies. Prior to his appointment as Chief Executive Officer, Mr. Moran was President of the CIL/ACES$ Board of Directors. His previous business experience includes Director of Business Development with a leading manufacturer of prosthetics, and positions with the Treasury Department of the Commonwealth of Pennsylvania. Tim has a B.A. in Business Administration and is currently pursuing his Master's in Business Process Management with an emphasis in healthcare.

Experience

(2012 – Present) Center for Independent Living/ACES$ Scranton, PA

Chief Executive Officer

- Reports to the Board of Directors.
- Provides leadership to a staff of 92 in 6 locations in Pennsylvania, Illinois (2), Georgia, Wyoming and Colorado.
- Oversight for all operations and functions of Center for Independent Living, Transitional Skill Center, and ACES$ Financial Management Services to include: finance, information technology, human resources, administration, marketing, facilities management, independent living services, home and community based services, advocacy, and customer service.
- Challenges the status quo and implement new processes and efficiencies to increase productivity and accountability to the organization.

(2011 – 2012) Hanger Prosthetics and Orthotics Scranton, PA

Business Development Manager

- Seasoned sales professional representing a wide variety of prosthetic and orthotic lines across Pennsylvania and New Jersey
- Grew key accounts by 22% in two quarters
- Developed monthly and yearly budget sales forecasts.
- Recognized sales leader within the state of PA - achieved 10.6% sales growth in new client base.
- Developed and served as Regional Coordinator for the Amputee Empowerment Partners.

(2008 – 2009) Municipal Energy Management Scranton, PA

Sales and Marketing Consultant

- Successfully completed multi-million dollar capital improvement projects for public and private sector client base.
- Forerunner in obtaining state and federal grants for client base to ensure cost savings and fiscal stability within client's budget.
- Provided leadership to the management, council, and Mayor in implementing the energy improvements.

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Timothy J. Moran

- Led (coordinated, facilitated, and motivated) the efforts of the individual, team, client, and other resources associated with project activity
- Managed projects within the established scope, schedule, and budget

(2006 – 2008) **Department of Treasury, Commonwealth of Pennsylvania** **Harrisburg, PA**

Regional Director of Investigations - Office of Investigations

- Responsible for staff of six within the Office of Investigations.
- Conducted over 300 statewide investigations including check fraud, unclaimed property, State Workman's Insurance Fund (SWIF), unemployment payment and claims fraud.
- Liaison with Attorney General's Office of the Commonwealth of Pennsylvania, Federal Law Enforcement Agencies and local police and District Attorney's Offices from the inception to the completion of an investigation.
- Tracked cases through the entire process of criminal investigation, prosecution, probation and parole, and monitored restitution paid.

(2006 – 2008) **Department of Treasury, Commonwealth of Pennsylvania** **Harrisburg, PA**

Special Investigator III & IV- Office of Special Investigations

- Planned, developed, and administered a state-wide program of investigations to detect violations of law and obtain evidence and information concerning Commonwealth and municipal employees, as well as business and personnel under contract with the Commonwealth.
- Executed investigations of public entities by examining financial records and legal documents pertaining to the use of public funds to determine if those funds are being used in compliance with the state law.
- Completed comprehensive internal medical, financial and fraud investigations of personnel of the Department of the Treasury.

Education

Delaware Valley College **Doylestown, PA**

Bachelor of Science in Business Administration

Community Involvement

- Amputee-Coalition of AMERICA - National Advocacy Board of Directors
- Board of Directors - Deustch Institute
- Board of Directors - Northeast Pennsylvania Center for Independent Living
- Certified Peer Counselor - specializing in trauma accidents

aces$ FINANCIAL MANAGEMENT SERVICES

1142 Sanderson Avenue, Scranton, PA 18509 •(570) 344 – 7211 • cmorrison@mycil.org

Craig C. Morrison

Biography

Craig Morrison, Vice President - FMS Operations, has overseen the staff and the day-to-day operations of ACES$ since 2009. Prior to joining ACES$, Mr. Morrison spent 22 years in the military retiring as State Senior Personnel Sergeant Major and has a B.A. degree. Under his leadership, ACES$ continues to grow and exceeds industry standards of quality. Craig's emphasis on customer service is a key contributor to the success of ACES$ and our satisfied Consumers.

Experience

(2007 – Present) **ACES$** **Springfield, IL**

Vice President - FMS Operations (2014 – Present)
Director, Illinois Operations (2012 – 2014)
Illinois Project Manager (2008 – 2012)

- Accountable for all Illinois Operations; parent company resides in Pennsylvania.
- Supervisor and mentor to 8 employees in two locations in Illinois.
- Serve and accountable to over 3,000 consumers in Illinois.
- Liaison between Pennsylvania and Illinois operations.
- Market to all consumers and service facilitators in Illinois.

(1995-2007) **Illinois Army National Guard** **Springfield, IL**

State Senior Human Resource Sergeant Major (2007)

- Accountable for all personnel actions in the state.
- Set administrative policy for the Illinois Army National Guard.
- Supervised staff of 70 federal and state personnel.
- Processed payroll for 50 federal employees in a web-based system
- Managed and accountable for all automated personnel systems in the state
- Controlled and managed a budget of $14 million for the personnel division

Education

Eastern Illinois University **Charleston, IL**
Bachelor of Arts

Black Hawk Community College **Moline, Illinois**
1998 Emergency Medical Technician –

(570) 344 – 7211 • cmorrison@mycil.org
Craig C. Morrison

Paramedic
1991 Associates of Arts Degree

Affiliations

- The Family Support Network - Life member
- National Guard Association of Illinois - Life member

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Kelly A. Brown

Biography

Kelly Brown is Vice President of Administration for CIL/ACES$ with responsibility for human resources, administration and marketing for the organization. Ms. Brown has a Bachelor of Science degree from the University of Vermont and began her career in executive search and human resources. Kelly has most recently worked in strategic marketing and advertising. She has a great deal of client service experience which enables her to be highly effective in the CIL/ACES$ customer service oriented culture. She earned her SHRM-CP in 2016.

Experience

(2013 – Present) Center for Independent Living/ACES$ Scranton, PA

Vice President of Administration (2014-Present)

Director of Administration (2013-2014)

- Responsible for administration, human resources, communication and marketing activities for the organization.
- Manages employment, compensation, benefits and training, compliance and employee services.
- Responsible for development of all marketing materials, website, advertising, public relations, events and all marketing related activities and partnerships.

(2010 – 2013) Lavelle Strategy Group Scranton, PA

Communications Strategist

- Managed client relationships for advertising, marketing and public relations agency.
- Responsible for client communications, project traffic, vendor relations and industry research.
- Key member of client-strategy team.
- Assisted in business development.
- Coordinated all major client events, including fundraisers.

(2008 – 2010) Mountainside Estates for Women Moscow, PA

Staff Member

- Responsible for helping chemically dependent women work towards a better way of life at this private recovery residence.

(2008 – 2010) Marworth Treatment Center Waverly, PA

(570) 344 – 7211 • kbrown@mycil.org
Kelly A. Brown

Counseling Associate

- Worked with patients recovering from chemical dependency, one-on-one and in groups to support the counseling staff.
- Developed and delivered recovery-based seminars.

(2004 – 2007)	Foote Cone & Belding	New York, NY

Vice President, Professional Recruitment

- Accountable for the identification, evaluation and hiring of all FCB advertising account management professionals in addition to high level strategists and integration specialists.
- In charge of creating strategic staffing, training and mentoring programs for the account management team.
- Managed diversity recruiting programs as well as campus recruiting.
- Hiring responsibilities ranged from Executive Vice President to Account Executive levels.

(2001 – 2003)	Northwestern Mutual	Los Angeles, CA

Director, Professional Recruitment

- Responsible for identifying, evaluating, and recruiting life insurance agents to the #1 Agency in the network.
- Managed a staff and supervised campus recruiting.

(1999 – 2001)	McKinsey & Co.	Chicago, IL

Recruiting Manager, Service Operations Manager

(1989 – 1998)	Russell Reynolds Associates, Inc.	Chicago, IL

Associate, Consumer Goods and Services Practice
Associate, Insurance and Financial Services Practice

(1987 – 1989)	Booz, Allen & Hamilton, Inc.	New York, NY

Recruiting Coordinator

(1986 – 1987)	Gretchen Bellinger, Inc.	New York, NY

Sales Representative

University of Vermont Burlington, VT
(1986) Bachelor of Science

2

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1142 Sanderson Avenue, Scranton, PA 18509 • (570) 344 – 7211 • mmellody@mycil.org

Michael J. Mellody, CPA

Biography

Michael Mellody has been with CIL/ACES$ since 2016. As Vice President & Chief Financial Officer, Mr. Mellody has responsibility for the full scope of accounting functions to include payroll, A/P & A/R (accounts payable and receivable), tax reporting, general ledger, cash flow and budgeting for agency and individual programs. During his first year at CIL/ACES$, Mike has implemented automated accounting and payroll systems to significantly enhance accuracy and productivity. Mike has his B.S. in Accounting from Wilkes University, and is a Certified Public Accountant (CPA).

Experience

(2016 – Present) **Center for Independent Living/ACES$** **Scranton, PA**

Vice President and Chief Financial Officer

- Provides oversight of entire finance organization for CIL and ACES$
- Key team participant in the development of the overall organizational and market strategy
- Responsible for the timely and accurate financial and operational reporting to all stakeholders, including operations, Board of Directors, financial institutions and regulatory agencies
- Responsible for cost modeling of potential new business, as well as profitability analysis of current business lines
- Evaluation, development and implementation of risk management solutions for both the organization and the Clients served
- Maintains and develops relationships with multiple financial institutions
- Leads awareness of overall program and organizational cost strategy

(2013 - 2016) **Jack Williams Tire Co., Inc.** **Moosic, PA**

Chief Financial Officer

- Promoted from Controller to Chief Financial Officer after only eleven months with the organization.
- Member of the Executive Committee.
- Responsible for the entire Finance organization to include: Financial Reporting and Planning, Budgeting, Accounting, Treasury, Accounts Receivable, Accounts Payable and Safety.
- Responsible for the financial reporting and analysis for 35 retail locations, 12 wholesale locations, the corporate office and special events.
- Saved the company over $130,000 in expenses during first year of tenure.

(570) 344 – 7211 • mmellody@mycil.org
Michael J. Mellody, CPA

(1996 - 2013) **Waste Management, Inc.** **Newtown, PA**

Senior Manager of Financial Controls and Analysis

- Managed contracts and pricing with third party transportation vendors with annual spend of over $400 million.
- Developed and implemented a sourcing program that saved the company $9.6 million.
- Managed local and company-wide projects to control costs, optimize operational activities and drive revenue

(1992 - 1996) **Parente, Randolph, LLC.** **Scranton, PA**

Senior Accountant

- Performed compilations, reviews and audits of corporations, sub-chapter S corporations, and not-for-profit entities
- Prepared individual, corporate and sub-chapter S corporate income tax returns and payroll tax returns

Education

Wilkes University **Wilkes-Barre, PA**
Bachelor of Science in Accounting, Cum Laude (1992)

1995
Certified Public Accountant –
Commonwealth of Pennsylvania

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1142 Sanderson Avenue, Scranton, PA 18509 •(570) 344 – 7211 • whann@mycil.org

William Hann

Biography

William Hann, Director of Information Technology – FMS Operations for ACES$ Financial Management Services, is an accomplished IT professional with 17 years of technology implementation and management experience. Has served is a variety of capacities to include: project consultant, corporate help desk lead and member, senior network administrator and system technologist.

Experience

(2014– Present) **Center for Independent Living/ACES$** **Scranton, PA**

Vice President/ Chief Information Technology Officer
Director of Information Technology – FMS Operations

- FMS IT operational infrastructure oversight
- Implementation and satellite equipment readiness
- Architect, maintain and test IT Disaster Recovery Planning
- Supervise access controls to HIPAA and PII information
- Refactor FMS workflows for agility and efficiency

(2005 – 2014) **Times-Shamrock Communications** **Scranton, PA**

Senior Systems Analyst

- Provided user and system support for Unisys CMS producing 12 newspapers and other print media and commercial printing projects
- Spearheaded automated enterprise security scanning and patch management
- Implemented help desk performance metrics and IT asset monitoring, using reporting and visual analysis tools to mine historical data
- Introduced web-based interactive user training and desk top remote administration to promote centralized IT management of remote offices

(2001 – 2004) **Moss Motoring Ltd.** **Santa Barbara, CA**

Windows & Network Administrator

- Phone system administration
- Introduced layered antivirus, spam and content filtering solutions

(2000-2001) **Imperial Bank** **Redondo Beach, CA**

(570) 344 – 7211 • whann@mycil.org
William Hann

Helpdesk Support

- Resolved design defects in a database tracking $30 million in loan assets recovering months of corrupted transaction data

(1997 – 2000) **Superforms Tax Service** **Syracuse, NY**

Application Support Technician

Education

Le Moyne College **Syracuse, NY**
Bachelor of Arts in Psychology 1994

Microsoft Certified Professional

-

1142 Sanderson Avenue, Scranton, PA 18509 • (570) 344 – 7211 • panania@mycil.org

Peter A. Anania, MCP

Biography

Peter Anania is Vice President and Chief Information Officer for CIL/ACES$. Before joining CIL ACES$, Mr. Anania spent many years in web application development for the financial services and healthcare industries. He and his team are responsible for our propriety software programs, PAID and NOTE, as well as the development and management of all of our software programs. As we strive for excellence, Peter stays on the cutting edge of technological advancements enabling CIL/ACES$ to be at the forefront of our industry. He holds the following educational degrees: B.S. in Ceramic Science and Engineering, B.S. in Information Technology, M.S. in Software Engineering, and M.B.A. in Management Information Systems.

Experience

(2014 – Present) Center for Independent Living/ACES$ Scranton, PA

Vice President and Chief Information Officer (2014-present)

- Oversees all software development and management for CIL/ACES$. Has personal oversight for the continuous improvement process of our financial management services software programs, PAID and NOTE
- Chairs internal technology audit committee responsible for recommending changes and upgrades to PAID and NOTE
- Manages a team of web application developers who implement software changes and upgrades
- Maximizes efficiencies and then creates streamlined business processes through the development of state-of-the-art software programs

(2013 – 2014) Geisinger Wilkes-Barre, PA

Senior Web Application Developer

- Using C#, MVC and WCF, designed, developed and deployed web, integration and database solutions for cross enterprise SSO applications (using federated security models against SAML objects) in the healthcare industry while performing ACORD transactions using HL7 standards.
- Using T-SQL on multiple MS SQL databases, completed software development and supported existing applications by developing and performance tuning SSIS packages, SSRS solutions and SQL code.
- Managed agile development team on large multi sprint projects as senior developer

(570) 344 – 7211 • panania@mycil.org
Peter Anania, MBA

(2011 – 2013) **Prudential** **Moosic, PA**

Technical Systems Analyst

- Using C++, C# and WCF, designed, developed and deployed middleware and batch solutions as both SOA web services and DCOM windows services.
- Using C# and WPF, designed, developed and deployed case management desktop applications, DAL components and batch processing systems for various lines of business within exceptionally tight turn around windows.
- Produced application documentation, technical specifications and design documents for middleware and front end applications using MVC and MVVM that targeted Java, C++ and C# implementations.

(2003-2011) **Deluxe Digital Studios (Division of Deluxe®)** **Moosic, PA**

Lead Software Engineer

- Assumed project management responsibilities for large-scale C# ASP .Net migration from failing consulting group, thus delivering the project on time, on budget and with originally specified feature set; saving million dollar losses.
- Using C#, ASP .Net and AJAX, designed, developed and implemented web based enterprise wide finance, operations management, quality control and inventory management web based applications.
- Using T-SQL, supported software development initiatives by developing and administering backend solutions (tables, triggers, views, functions and stored procedures) onto company MS SQL databases.
- Organized UAT group, developed testing documentation and administered tester meetings.
- Maintained, enhanced and supported existing PHP, ASP 3.0 (with VB) and Java based web systems.

(2007-2009) **University of Scranton** **Scranton, PA**

***Research & Graduate Assistant,* University of Scranton**

- Developed new MBA level online courses for SAP user certification program for the University of Scranton's Kania School of Business.
- Designed and developed a tutorial program for the University of Scranton's Software Engineering department, which is used as a teaching tool by professors and students.

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(570) 344 – 7211 • panania@mycil.org
Peter Anania, MBA

(2002-2003) **College Misericordia** **Dallas, PA**

New Media Department Director

- Assumed directorship of New Media business unit. Managed staff, equipment and systems. Developed and implemented unit mission statement which resulted in full resource utilization and increased enrollment.
- Using PHP, My SQL and JavaScript gathered requirements, wrote specifications, designed and developed web-based systems for college entities, alumni organizations and nonprofit organizations.
- Taught ASP 3.0, Flash, PHP scripting courses.
- Optimized configuration of laboratory systems and equipment, which maximized client utilization.

(1994-2001) **Tunkhannock Area High School** **Tunkhannock, PA**

Computer Sciences Teacher

- Developed new curriculums in the areas of software development and internet technology.

Technical Skills

- 15 years programming experience using C#, VB, C++, Java, Pascal and COBOL.
- 10 years database development and administration experience using MS SQL, My SQL and Oracle.
- 10 years scripting using ASP.Net, XAML, SAML, ASP, PHP, HTML, JavaScript and JQuery.
- 10 years analyzing business processes and creating custom reports using SSIS, SSRS and Crystal Reports.
- 7 years web design experience using Macromedia Dreamweaver, MS Visual Studio and Notepad.
- 2 years SAP experience

Certifications

- Comp TIA A+, Network+ and iNet+ Certified.
- Microsoft Certified Systems Administrator (MCSA)
- Microsoft Certified Professional (MCP)
- New Horizons Certified Instructor (a Microsoft Certified Partner)
- Mainframe Computer Operations Specialist (USAF, 1981 – 1987, Honorable Discharge)

1142 Sanderson Avenue, Scranton, PA 18509 •(570) 344 – 7211 • hlogan@mycil.org

Helen D. Logan

Biography

Helen Logan, Director of Accounting, has more than ten years of progressive accounting and auditing experience. She is proficient in Windows, MS Office and experienced in a multitude of accounting systems. Ms. Logan is organized and detail-directed problem solver. She excels in recordkeeping, documentation techniques and has strong communication skills, both verbal and written.

Experience

(2008– 2014) Center for Independent Living/ACES$ Scranton, PA

Director of Accounting (2014-Present)
Accounting Manager (2008-2014

- Responsible for developing and maintaining accounting principles, practices and procedures to ensure accurate and timely financial information
- Supervises accounting staff, ensuring that work is properly allocated and completed in a timely and accurate manner
- Monitors general ledger transaction entries and subsidiary ledger reconciliations
- Analyzes department processes to develop and implement more efficient procedures to enhance workflow and resource utilization while maintaining a high level of accuracy and ensuring proper segregation of duties and document retention
- Prepares for and facilitates year-end financial statement audit activities
- Oversees daily cash flow and banking requirements
- Advises staff regarding the handling of non-routine reporting transactions
- Trains new and existing staff as needed
- Responds to inquiries from the Chief Executive Officer, Vice President and CFO, and other Directors regarding financial results, special reporting requests, etc.

(2006 – 2008) JonesKohanski &Co., PC. Moosic, PA

Senior Accountant

- Served as chief field auditor on the annual audits of local non-profit and governmental entities
- Gained extensive familiarity with 501(c)(3) accounting practices
- Trained staff to assist in audits and provide other various client services
- Led transition for multiple firm software changes; became point person for management and staff when questions developed or problems occurred

(570) 344 – 7211 • hlogan@mycil.org

Helen Logan

(2001 – 2006) **McGrail Merkel Quinn & Associates** **Scranton, PA**

Staff Accountant

- Participated in annual audits of local companies and organizations, including SEC, banking, manufacturing, retail, non-profit and governmental entities
- Gained special expertise as chief auditor for multiple pension audits, developing special knowledge of payroll systems and ERISA requirements
- Participated with a team of auditors in the creation and execution of a plan to provide outsourced internal auditing services to the banking industry

Education

University of Scranton **2003** **Scranton, PA**

B.S., Accounting,

Magna Cum Laude

aces$ FINANCIAL MANAGEMENT SERVICES

1142 Sanderson Avenue, Scranton, PA 18509 •(570) 344 – 7211 • dalberigi@mycil.org

Diane Alberigi, FPC, CPP

Biography

Diane Alberigi, Director of Payroll Services for ACES$, has been with the organization since 2007. Ms. Alberigi spent 30 years in the insurance industry prior to joining ACES$. The payroll department has flourished under her supervision. When she began at ACES$, the department issued 2,900 checks semi-monthly and currently issues 11,000 semi-monthly. Diane is a Certified Payroll Professional (CPP). It bears mention that 3 payroll staff members are also Fundamental Payroll Certified (FPC).

Experience

(2007 – Present) **Center for Independent Living/ACES$** **Scranton, PA**

Director of Payroll Services (2014 – present)

Payroll Supervisor (2007 – 2014)

- Oversees the day-to-day operations of the payroll department to include 10 staff, with regard to receiving and verifying timesheets, issuing checks for the States of Illinois and Pennsylvania (currently total approximately 6,500 checks/direct deposits semi-monthly)
- Handles the transfer of taxes to the IRS
- Runs reports to ensure accuracy of payroll and deductions
- Enters and monitors all wage garnishments

(1975 – 2007) **Chamberlin & Reinheimer Insurance** **Scranton, PA**

Controller, Licensed PA Insurance Agent

- Responsible for all accounting, including processing and reconciling all monthly bank statements, balance sheet, operating statement.
- Supervised office staff of 30 employees. Processed payroll and all associated taxes including monthly, quarterly and year end reports to IRS.
- Handled all agency benefits including AFLAC, 401K, Life Insurance and Disability. Responsible for writing and enforcing office manual.
- Responsible for office technology including installation and training, as well as all updates to system.

1142 Sanderson Avenue, Scranton, PA 18509 • (570) 344 – 7211 • dseidel@mycil.org

Duane Seidel, MBA, CPP

Biography

Duane Seidel, Director of FMS Tax Operations for ACES$ is a Certified Payroll Professional (CPP) with the American Payroll Association since 2005. He has been with CIL/ACES$ since 2007. Mr. Seidel has prior accounting experience with another Center for Independent Living as well as with a manufacturing concern. He's earned his B.S. in Business and Accounting as well as a Master's in Business Administration. Duane's extensive experience working with persons with disabilities combined with his encyclopedic knowledge of tax issues and payroll systems contribute to his ability to provide outstanding service to Consumers.

Experience

(2006 – Present) Center for Independent Living/ACES$ Scranton, PA

Director of FMS Tax Operations (2014-present)

Technical Manager, Fiscal Employer Operations (2007 – 2014)

- Oversees overall operation of payroll and tax processes of Fiscal Employer Agent Operations in WY, CO, GA, MD and IL serving 6,000 consumer employers.
- Audits and upgrades payroll system setups of the fiscal employer agent payroll functions as necessary.
- Implements, reviews, and distributes Fiscal Employer Agent procedures within FE/A manual to staff, ensuring correct reporting procedures are followed.
- Reviews federal, state, and local guidelines ensuring compliance with operations and incorporating changes into the current FE/A manual.

Staff Accountant (2006 to 2007)

- Oversaw GL closings and quality control. Prepared and supervised posting to GL.
- Assisted Controller in coordinating annual audits (including OMB-A133), tax returns, and federal cost proposals. Assisted Controller in maintaining accounting records and permanent files including assets, taxes, audits and bank reconciliations.
- Maintained journal entries, schedules of expenses and receivables. Performed account analysis as requested.
- Assisted Controller in compliance reports, financial statements for Agency, Board of Directors and external agencies.

(2002 – 2006) Berks County Center for Independent Living Reading, PA

Controller

- Responsible for managing all payroll functions of a Fiscal Employer Agent serving 350 consumer employers.

(570) 344 – 7211 • dseidel@mycil.org
Duane Seidel, MBA, CPP

- Assisted Director of Finance with monitoring over 40 individual funding sources, from line-item restricted to completely unrestricted for the entire non-profit organization totaling in excess of $10 million annually.
- Responsible for cash flow for the organization including developing forecasts for the Executive Director and Board members as needed.
- Set up all levels of tax jurisdiction, as well as bi-weekly payroll processing for clients.

(1999 – 2002) **Fleetwood Industries Inc.** **Reading, PA**

Senior Accountant

- Responsible for payroll processing for manufacturing plant of 120 employees.
- Administration of all payroll related tasks including 401(k)/profit sharing plan, garnishments and quarterly/year-end employer and employee payroll tax reporting.
- Assisted Controller with monthly financial statement preparation as well as expense analysis.

(1995-1999) **Fidelity Technologies Corporation** **Reading, PA**

Senior Accountant

- Responsible for the daily functions of the accounting department staff of three members.
- Produced monthly financial statements, reconcile general ledger accounts, maintain asset and insurance schedules.
- Assisted all department managers in the budgeting process.

Education

1994
Bloomsburg University **Bloomsburg, PA**
Bachelor of Science in Business Administration specializing in Accounting

2004 **Kutztown, PA**
Kutztown University
Masters in Business Administration

2005
Passed the Certified Payroll Professional Exam

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ACES$ FINANCIAL MANAGEMENT SERVICES

16750 S. Oak Park Avenue Tinley Park, IL 60477 • (708) 532-3319 • emiller@mycil.org

Emily Nicole Miller, LGSW

Biography

Emily Miller, Director of Training and Client Care, is a self-direction and person-centered approach specialist, as well as a SAGECare Certified Trainer. As such, Emily ensures ACES$ employees receive culturally competent service learning. Ms. Miller joined the ACES$ team in 2017, after working with the organization as a consultant to develop FMS online, self-direction training programs. Prior to joining ACES$, Ms. Miller was a Care Consultant with the Alzheimer's Association National Office. Emily spent three years at the Maryland Department of Aging as an Aging and Disability Resource Center Program Manager, with extensive experience in Options Counseling. Ms. Miller actively works on client care/customer service monitoring, quality assurance, training program development and implementation, as well as the creation of learning opportunities for the entire organization.

Experience

(2017- Present) | **ACES$** | **Tinley Park, IL**

Director of Training and Client Care

- Creates and implements self-direction training programs for all CIL/ACES$ Staff.
- Develops and oversees self-direction training for all employers in state programs, both online and in-person.
- Contributes to the strategic development of training and education for program participants of new and existing contracts, ensuring our employees, and program participants, have the most comprehensive and current training available.
- Understands new contracts and identifies how best to educate new participants and our staff.
- Designs targeted and proactive trainings, externally and internally, to reflect changes from State government, CMS and MCOs. Better educated staff and consumers equal a more successful and sustainable program.

(2016 – 2017) | **Alzheimer's Association National Office** | **Chicago, IL**

Care Consultant

- Provided brief clinical therapy and expert guidance to caregivers, individuals with Alzheimer's disease/Dementia, and professionals contacting the 24/7 Helpline.
- Conducted safety assessments and involved APS, Police, Paramedics and local chapter staff members, based on clinical judgment.
- Help callers better understand Alzheimer's disease, behaviors commonly associated with the disease, and caregiving strategies through a person-centered lens.

16750 S. Oak Park Avenue Tinley Park, IL 60477 (708) 532-3319
Emily Nicole Miller

- Served as a resource to colleagues regarding legal competency, guardianship, advanced directives, and aging policy and programs.

(2013-2016) **Maryland Department of Aging** **Baltimore, MD**

Aging and Disability Resource Center Program Manager

- Managed and coordinated the creation, implementation, integration, and ongoing evaluation of Aging and Disability Resource Center Initiative and Options Counseling.
- Work with federal, state, local and private partners to procure sustainable relationships

(2012-2013) **Capitol Hill Village** **Washington, D.C.**

Service Administration Coordinator

- Coordinated daily member services, information management, volunteer activities and quality control assessments.
- Developed volunteer-driven care coordination program to serve frail older adults, created and implemented volunteer training, managed daily activities and services.

(2010- Present) **Button Up, LLC** **Chicago, IL**

Co-Owner/Founder

- Manages finance, customer service, and partnership development.

Education

University of Maryland - Baltimore, MD
Master of Social Work

Millikin University - Decatur, IL
Bachelor of Arts, Human Services

SAGECare Certified Trainer
Services and Advocacy for LGBT Elders

2

1142 Sanderson Avenue, Scranton, PA 18509 • (717) 798 – 4107 • kmichael@mycil.org

Kristy Westpfahl Michael

Biography

Kristy Westpfahl Michael, Director of FMS Research and Development, joined the ACES$ team in 2015, after more than eight years of working with ACES$ as a consultant on FMS development, program policy and implementation. Prior to joining ACES$, she was an Associate with HCBS Strategies, a National consulting firm. During her time with HCBS Strategies she worked with a number of States including: Hawaii, Alaska, the District of Columbia, Maryland, Minnesota, Colorado and Illinois developing options counseling, QA/QI, VD-HCBS, Cash and Counseling, Balancing Incentive, Money Follows the Person and other Consumer-directed programs. She has worked with several states under Federal Systems Change, Enhanced ADRC, and Options Counseling grant initiatives. Ms. Michael actively works on business expansion and program development as well as new implementation tasks such as updating policies and procedures and FMS forms, training and communication plans to reflect state and program requirements.

Experience

(2015- Present)	ACES$	Scranton, PA

Director of FMS Business Development and Research

- Actively working on FMS business and program expansion including tasks such as research, proposal writing, presentation development and identification of new opportunities
- Developing implementation strategies and supporting documents
- Updating internal policies and procedures and related documentation based on Federal and State guidelines, best practices and program regulations
- Assisting with the development of IT processes to support new program requirements and functionality
- Assisting with identifying and responding to new funding opportunities for FMS and CIL activity

(2006 – 2015)	HCBS Strategies, Inc.	Baltimore, MD

Associate

- Participated in projects for Hawaii, Alaska, the District of Columbia, Colorado, Illinois, Maryland, and Minnesota
- Written policies and procedures for a systems change grant that provides transition services to dual diagnosed adults and foster care youth
- Developed readiness assessments for Hawaii's VD-HCBS program as well as policy and procedure documents and participant guides
- Created marketing materials for systems change grant to include brochure, website text and various other tools to be used in house for the processing and management of transition services

402 Wood Street Harrisburg PA 17109 • (717)671-5819
Kristy Westpfahl Michael

- Performed statistical data analysis, database creation, research and literature review as well as policy analysis for various projects
- Created policy and procedure manuals for Pennsylvania Centers for Independent Living and FMS providers as well as a gaps analysis against State standards
- Contributed to the development of multiple comprehensive assessment tools
- Developed multiple quality management tools used by both states, CILS and FMS providers
- Assisted with the development of Options Counseling protocols, as well as the development of automated systems, and training materials to assist with the piloting of those tools
- Conducted 20 readiness reviews for county AAA/ADRC (MAP) sites across the state of Maryland as part of their Money Follows the Person /ADRC imitative
- Have performed audits with all county AAA/ADRC (MAP) sites to assess current standing against Money Follows the Person and pending Balancing Incentive Program requirements
- Have created program policies and procedures, guidebooks, and readiness assessments for multiple VD-HCBS initiatives
- Have written multiple proposals for ACES$, as well as strategic plans for the role out of operations in newly acquired states

(2005-2006) National Civil War Museum Harrisburg, PA

Development Specialist, Non-profit

- Grant writing
- Obtained grant, major gift, planned giving and sponsorship dollars for special projects, operational funds, etc. for the organization
- Responsible for management and maintenance of organizations membership base
- Responsible and met goal to raise over one half of organizations operating budget
- Launched ANTHEM- official magazine of The National Civil War Museum
- Editor in Chief of ANTHEM

Shortly after arriving both CEO and Marketing Department were dismissed from the organization and obtained the following additional duties:

- Ran marketing initiatives for museum including creation of adds, billboards, press releases and other marketing materials
- Managed media requests with local and national media outlets
- Served as main contact for the Museum for public and media inquiries and well as for the Board of Directors
- Worked with board of directors to analyze annual budgets and prepare fiscal budgetary impact spending reports.

(2002-2005) Whitaker Center for Science and the Arts Harrisburg, PA

Sponsorship Manager, Non-profit

- Obtained Corporate Sponsorships for various programming initiatives
- Developed new sales strategies, proposal templates, fulfillment reports, applied industry standards to valuing benefits offered to sponsors etc.

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Kristy Westpfahl Michael

- Managed all details of sponsorships such as prospecting, negotiating, contracts, execution of benefits, and fulfillment reports.
- Designed marketing pieces and content for sponsorship proposals.
- Managed marketing initiatives with local and national media outlets
- Obtained one quarter of organizations annual operating budget – meeting or exceeded projected goals for all three years.

(199-2002) **Knowledge Planet** **Mechanicsburg, PA**

Release Manager

- Worked with company IT engineers and account reps in navigating and developing updates to software and new releases for the company's Internet Workforce Performance Management software which provided Global 2000 companies with workforce and performance management solutions for those seeking to achieve a competitive advantage through people.
- Rolled out two successful versions of the system
- Actively worked with KnowledgePlanet's customers to include leading global companies such as Avon, BMW, Booz-Allen & Hamilton, Chevron, Cracker Barrel, Fidelity Investments, General Motors, Glaxo, Hershey Foods, Marsh McLennan, Morgan Stanley Dean Witter, Nike, Northwestern Mutual

Education

Bucknell University **1999** **Lewisburg, PA**
Bachelor of Science

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1142 Sanderson Avenue, Scranton, PA 18509 • (570) 344 – 7211 • mpacyna@mycil.org

Mari Pacyna

Biography

Mari Pacyna has been with CIL/ACES$ since 2016. As Director of Finance, Ms. Pacyna has responsibility for the full scope of accounting and financial reporting functions to include payroll, accounts payable, accounts receivable, general ledger, budgeting and cash flow. Mari has her B.S. in Accounting from the University of Scranton.

Experience

(2016 – Present) Center for Independent Living/ACES$ Scranton, PA

Director of Finance

- Responsible for all accounting and financial reporting functions within the organization as required by law, contracts, regulations, and generally accepted accounting principles.
- Reviews and reports monthly financial results to the CFO for presentation to the Board.
- Monitors all bank accounts to ensure compliance.
- Responsible for the supervision of the accounting and billing staff.
- Provides guidance on day-to-day activities within the organization.
- Ensures all policies are followed and maintained; reviews for necessary updates.

(2015 – 2016) McCarthy Group of Florists Clarks Summit, PA

Chief Financial Officer

- Responsible for day-to-day management of all accounting functions.
- Reviewed and finalized month-end reports before distribution to CEO and third parties.
- Implemented processes for internal analysis of purchasing documentation against vendor pricing to substantiate year-end management pricing entries.
- Provided necessary documentation and negotiation with banks for company loans.

(1999 - 2015) International Salt Company, LLC Clarks Summit, PA

Director of Finance (2009 – 2015)
Assistant Director of Finance (2006 - 2009)
Assistant Controller (1999 – 2006)

- Generated and reviewed month-end reports for internal review with CEO as well as reports for Board of Directors.
- Managed year-end audit, ensuring completion by third week of January.
- Prepared GAAP financial statements.
- Processed weekly payroll for 100 employees.
- Responsible for managing accounts payable processing and check disbursements with annual volume of 400,000,000.
- Managed book and tax fixed asset systems.

(570) 344 – 7211 • mpacyna@mycil.org

Mari Pacyna

(1989 - 1999) **Parente, Randolph, LLC.** **Scranton, PA**

Senior Accountant (1993 – 1999)

Tax Staff Accountant (1991 – 1993)

Audit Staff Accountant (1989 – 1991)

- Conducted and reviewed compilations for companies of various sizes in Northeast Pennsylvania
- Prepared and reviewed tax returns for corporations, individuals, fiduciary, and non-profits.

Education

University of Scranton **Scranton, PA**

Bachelor of Science in Accounting (1989)

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References

We have included contract references in ***Table 5,*** in addition to letters of reference from Illinois and Wyoming *as **Figures 14-15***. Along with our letters of reference from contract administrators, we have provided two extra letters of reference. One letter from a prominent advocate and surrogate, the other from a Service Facilitator. Both are from Illinois where we serve as F/EA for both Adult and Child DD Waiver programs.

Table 5: Corporate Contract References

No.	***Name and Organization***	***Contact Information***	***Value, type, duration, and description of services provided***
1.	**Organization Name:** Illinois Department of Health and Human Services **Contact Person:** Dave Adden **Project Title:** FMS Services for Children and Adult with Developmental Disability Waivers	**Telephone:** (217) 524-0848 **E-mail:** DAVE.ADDEN@illinois.gov **Address:** 100 S Grand Avenue East Springfield, IL 62704	**Value:** FYE 2016 $5,873,985 PM/PM + $114.3 million in Medicaid funding **Type:** F/EA **Duration:** 2007-Present **Description:** ACES$ provides FMS for 7,500 Individuals throughout the State of Illinois. We have provided services under both the Children and Adult Waivers for Developmental Disabilities from 2007-Present.
2.	**Organization Name:** Colorado Health Care Policy and Financing Department (HCPF) **Contact Person:** Mallory Cyr **Project Title:** FMS Services for the Consumer-Directed Attendant Support Services (CDASS) Waiver	**Telephone:** (303) 866-6491 **E-mail:** mallory.cyr@state.co.us **Address:** 1570 Grant Street · Denver, CO 80203-1818	**Value:** FY 2017 (8 mos. ended 2-28-17) $281,804 PM/PM + $8,654,266 in Medicaid funding **Type:** F/EA **Duration:** 2015-Present **Description:** ACES$ provides FMS for Colorado's CDASS program
3.	**Organization Name:** Wyoming Department of Health **Contact Person:**	**Telephone:** (307) 777-2485 **E-mail:** ormershern@gmail.com	**Value:** FY 2017 (8 mos. ended 2-28-17) $ 470,540 + $7,054,112 in Medicaid funding

	Nicole Ormesher **Project Title:** FMS Services Consumer-directed Waiver Programs	**Address:** Developmental Disabilities Section, Behavioral Health Division Wyoming Department of Health 6101 Yellowstone Rd, Ste. 220 Cheyenne, WY 82002	**Type:** F/EA **Duration:**2016-Present **Description:** ACES$ provides FMS for Wyoming's LTC, ABI and CS Waivers

Figure 14: Illinois Reference Letter

Illinois Department of Human Services

August 21, 2017

To Whom It May Concern,

The Illinois Department of Human Services, Division of Developmental Disabilities has contracted with ACES$ since 2007 as an FMS provider.

Currently they are performing FMS services for approximately 7,000 individuals with developmental disabilities and their 14,000 employees. ACES$ processes over fourteen million dollars in payroll monthly. They have been able to serve the growing number of individuals needing their services. In 2012, for example, they served approximately 4,300 individuals.

They have won two contracts with the Division through a competitive bid process, and their current contract is in good standing.

ACES$ has met and continues to meet their contractual requirements. When the Division asks them to accomplish new tasks not explicitly listed in the contract, they are very responsive and quickly meet our new requirements.

If additional information is needed, please feel free to contact me.

Sincerely,

Dave Adden

Dave Adden
Division of Developmental Disabilities
Iles Park Complex
600 East Ash, Building 400, Mail Stop 1 South
Springfield, IL 62703
Phone: (217) 524-0848
Dave.adden@illinois.gov

Figure 15: Wyoming Reference Letter

Wyoming
Department
of Health

August 22, 2017

Corporate Reference – ACES$ Financial Management Services

To Whom It May Concern,

ACES$ FMS has had a business relationship with the Wyoming Department of Health since April 15, 2016. ACES$ was contracted to provide financial management services for the State's participant directed waiver programs, which include the Community Choices – Long Term Care, Comprehensive, Supports, and Acquired Brain Injury Waivers. ACES$ FMS has, and continues to successfully work with many individuals within the Department of Health, Division of Healthcare Financing (HCF) and Behavioral Health Division (BHD), throughout this project.

Since July of 2016, I have worked closely with ACES$ FMS throughout the transition and full implementation of the system. I worked with ACES$ to submit, review and implement change requests, modify the system to meet the needs of our waiver programs and participants, and ensure compliance with state and federal regulations.

ACES$ FMS successfully moved through the transition period, which entailed transitioning all participant directed clients, employers and workers from the two prior FMS vendors to ACES$. The FMS also assists all participants, employers and the State of Wyoming with:

- Ensuring participant expenditures are in accordance with program rules and individual budgets;
- Adhering to all IRS regulations, including all required record keeping and reporting (wage deductions, tax withholdings and payments, issuance of W-2s, etc.);
- Maintaining agreements and all essential paperwork for the Employer of Record (EOR);
- Maintaining an Employee file, including verification of citizenship, automobile insurance check, and background check;
- Ensuring staff hired have received required training, including CPR, First Aid, participant specific training, and Medication Assistance Training;
- Providing training and consultation to Participants and the EOR on financial requirements;
- Processing payments for goods and services;

- Provide monthly, quarterly and annual reports to the EOR, case manager, and the State of Wyoming;
- Establishing customer service number and responding quickly to questions/concerns.

ACES$ FMS is extremely knowledgeable of Medicaid rules and regulations, Department of Labor Laws, and all waiver programs. They stay up-to-date on ongoing changes in policy and strive to understand the uniqueness of our programs to ensure full state and federal compliance. All while maintaining a positive relationship with our waiver participants, providers and State staff.

They demonstrate professionalism, technical skills, communication skills, and the ability to work sensitively and compassionately with persons with disabilities. I would use them again in the future and recommend them without reservation.

Sincerely,

Nicole Lukkes

Nicole (Ormesher) Lukkes
Waivers & Home Care Services Coordinator
Wyoming Department of Health
401 Hathaway Building
Cheyenne, WY 82002
605.280.2823

An excellent resource to confirm our internal processes for operating as a Fiscal Intermediary, providing services under various tax and labor laws and IRS regulations, would be Mollie G. Murphy, CEO of Annkissam. (Contact information provided below.) Ms. Murphy and her team are a nationally respected F/EA consulting, analytics and technology firm. We invited Ms. Murphy to review our policy and procedure manual and internal systems in May 2014. Ms. Murphy made no revision recommendations at that time, however ACES$ has since then implemented FMS Blueprint, a web-based policy and procedure manual seen as a national best practice standard. By maintaining both our internal document as well as a customized version on FMS Blueprint, ACES$ is able to stay on trend with up and coming national best practices, and ensure we are at the forefront of technology, quality and Participant-driven FMS processes. In early spring of 2017, we began working with Ms. Murphy's team to perform an external review of our Blueprint Policy and Procedure Manual as part of our annual update process. As mentioned, ACES$ will customize our manuals for use in Vermont. Since our internal review in 2014, ACES$ filed a Veteran-Directed HCBS (VD-HCBS) FMS Readiness Review with Ms. Murphy's organization, which at the time was a federally contracted Technical Assistance provider and reviewer for the Veteran Program. FMS Vendors must pass the Readiness Review prior to providing services for any VD-HCBS program. Mollie's team passed our review without hesitation and deemed our Readiness Review completed in "record time" with no revisions. A completed version of our Readiness Review is available upon request.

Organization Name: Annkissam
Contact Person: Mollie G. Murphy, CEO
Telephone: 617-401-2480, ext. 702
E-mail: mollie.grotpeter@annkissam.com

We are members in good standing of the National Resource Center for Participant-Directed Services (NRCPDS) supported by Applied Self-Direction, where we serve on a number of sub-committees such as Block Grant Research Committee; Advancing Self-direction in a Less Regulated Environment Committee, and RFP Best Practice Committee. Additionally, we are members of a number of Disability, Independent Living and accounting organizations such as the Association for Developmental Disability Providers (ADDP), National Council on Independent Living (NCIL), the American Payroll Association (APA) and many others. We feel that being active members in these organizations allows us to stay abreast of upcoming trends, concerns, and issues, as well as provide an opportunity to network with, and mentor other organizations.

As noted earlier, in addition to the above-mentioned contract references, we have provided a letter of reference below, as ***Figure 16***, from one of our Illinois Employers to provide additional perspective. We have worked with Ms. Shirley Perez since 2007. In a state where there is choice in FMS providers, we are honored to work with her and serve her daughter for all these years.

Ms. Perez is a fierce advocate for individuals with disabilities in Illinois. She is the Executive Director of the Family Support Network. Shirley, and her team, work to provide information and resources to help individuals with disabilities live, love, work, and play in the homes and communities of their choice. Ms. Perez has thirty-five plus years of advocating and working with individuals and their families with disabilities. She is currently an active member of IDHD/LEND, a Consumer Advisory Committee comprised of individuals with disabilities, family members, and partner organizations in Illinois. She also serves on the Managed Care ad hoc Committee, DD Rebalancing Work Group, Going Home Campaign, Arc Integrated Community Support Group, UN CRPD (Convention on the Rights of Persons with Disabilities), Integrated Care Program (ICP) Focus Group, HFS Care Coordination Group, Health Care Reform, Illinois DHS, and the Division of Developmental Disabilities Quality Committee. She is a member of The Arc of Illinois and the National Arc. She served as vice-chairman of the Board of Directors for Envision Unlimited, (formerly CARC) and Chairperson of the Program Committee for over 28 years. Ms. Perez has encouraged us to provide her contact information as well, for additional follow-up should DAIL be interested.

Name	Contact Information	Role/Program/State
Shirley Perez	Telephone: 815-464-1832	Employer/Advocate
	Email: shirley@familysupportnetwork.net	Illinois Children and Adult DD Waiver

Figure 16: Participant Letter of Reference

The Arc
Illinois

To whom it may concern,

My daughter, Tamekia, receives services from the Home Based Support Services Program in Illinois and ACES$ is our financial management services provider. Like many adults with developmental disabilities, she is able to stay in her own home and receive individually tailored supports because she is a participant in this program.

The professional staff at ACES$ handle all matters associated with the payment of her personal support worker – payroll, payroll taxes, etc. – ensuring that all is accomplished in a timely manner and done correctly. The friendly ACES$ staff always responds promptly to our questions and treat us with courtesy and respect. This gives us peace of mind and the freedom to enjoy our valuable family time. I am so grateful to ACES$, for all they do to make our lives better.

Most sincerely,

Shirley A. Perez, Mother and Legal Guardian
Executive Director
Family Support Network
The Arc of Illinois
20901 LaGrange Road
Suite 209
Frankfort, IL 60423
(815) 464 – 1832
shirley@familysupportnetwork.org

We have also provided an additional letter of reference from Eileen Morrissey, Director of Family Support Services with Envision Unlimited in Illinois below as ***Figure 17.***

Figure 17: Eileen Morrissey Letter of Reference

envision

Empowering people. Creating possibilities.

May 18, 2017

Reference for ACES$ Financial Management Services

To Whom It May Concern,

My name is Eileen Morrissey, I am Director of Family Support Services with Envision Unlimited in Chicago, Illinois. I have been in service facilitation with Envision for 25 years and have worked with ACES$ Financial Management Services since they began providing services in 2007. The relationship that Envision has with ACES$ is excellent. It is my pleasure to provide this reference on their behalf.

Our Case Managers, and our Consumers, love working with ACES$. The relationships we have with ACES$ staff span from their Tinley Park office to the Springfield office to the Scranton office. We have incredibly positive relationships with all the ACES$ staff members. Not only is the rapport excellent, but we get an immediate response! ACES$ staff pick up the phone when we call. If they miss a call, they call us right back. They return our emails at once. They have a sense of urgency along with compassion.

Consumers in Illinois have a choice between FMS providers. We have 125 consumers - all but one are with ACES$. Most of them have their favorite person that they want to speak with, because they have built positive relationships. I speak with different people from ACES$ all the time. They are polite, kind, prompt and helpful.

Our families use the online portal all the time and love it. I always receive positive feedback about how easy it is to navigate.

We have never received a complaint about ACES$, zero in the ten years I have been working with them. There has only been positive feedback. I would absolutely recommend using ACES$, without hesitation.

Sincerely,

Eileen R. Morrissey, QIDP

Ms. Eileen Morrissey
Director of Family Support Services
Envision Unlimited
Chicago, Illinois
773-358-6941

Insurance

ACES$ currently meets and exceed the insurance requirements for this contract. We have provided our Certificate of Liability Insurance as ***Figure 18***. The only insurance we do not currently have in place at this time, is Vermont Workers' Compensation, as we do not have Vermont workers yet. Once we have Vermont employees, we will simply add this to our current Policy with Valley Forge Insurance Company.

Figure 18: Certificate of Liability Insurance

ACORD

NORTH01 OP ID: JG

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 08/14/2017

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER
Knowles Associates
316 Penn Avenue
Scranton, PA 18503
Robert J. Knowles, Jr.

CONTACT NAME: Eileen Kelly
PHONE (A/C, No, Ext): 570-342-3214 FAX (A/C, No): 570-342-3125
E-MAIL ADDRESS: ekelly@knowlesins.com

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER A: Philadelphia Indemnity Ins Co	
INSURER B: Lackawanna Casualty Company	11703
INSURER C: Valley Forge Insurance Company	
INSURER D:	
INSURER E:	
INSURER F:	

INSURED NEPA Center for Independent Living
Aces$
1142 Sanderson Avenue
Scranton, PA 18509-2623

COVERAGES CERTIFICATE NUMBER: REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	GENERAL LIABILITY X COMMERCIAL GENERAL LIABILITY CLAIMS-MADE X OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: X POLICY PRO-JECT LOC			[redacted]	10/08/2016	10/08/2017	EACH OCCURRENCE	$ 1,000,000
							DAMAGE TO RENTED PREMISES (Ea occurrence)	$ 1,000,000
							MED EXP (Any one person)	$ 20,000
							PERSONAL & ADV INJURY	$ 1,000,000
							GENERAL AGGREGATE	$ 2,000,000
							PRODUCTS - COMP/OP AGG	$ 2,000,000
							Profess	$ 1,000,000
A	AUTOMOBILE LIABILITY X ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS X HIRED AUTOS X NON-OWNED AUTOS				10/08/2016	10/08/2017	COMBINED SINGLE LIMIT (Ea accident)	$ 1,000,000
							BODILY INJURY (Per person)	$
							BODILY INJURY (Per accident)	$
							PROPERTY DAMAGE (PER ACCIDENT)	$
								$
A	X UMBRELLA LIAB X OCCUR EXCESS LIAB CLAIMS-MADE DED X RETENTION $ 10,000				10/08/2016	10/08/2017	EACH OCCURRENCE	$ 5,000,000
							AGGREGATE	$ 5,000,000
								$
B C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY Y/N ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	N/A			07/25/2017 10/11/2016	07/25/2018 10/11/2017	X WC STATU-TORY LIMITS OTH-ER	
							E.L. EACH ACCIDENT	$ 1,000,000
							E.L. DISEASE - EA EMPLOYEE	$ 1,000,000
							E.L. DISEASE - POLICY LIMIT	$ 1,000,000
A	Property Section				10/08/2016	10/08/2017		
A	Crime				10/08/2016	10/08/2017	EMP THEFT	1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach ACORD 101, Additional Remarks Schedule, if more space is required)

CERTIFICATE HOLDER

Vermont
Dept. of Disabilities, Aging
& Independent Living
280 State Drive
Waterbury, VT 05671-2070

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Robert J. Knowles Jr.

ACORD 25 (2010/05)

Technical Capabilities

In this section, we provide an overview of our technology, systems and capabilities as they relate to the scope of work within the RFP.

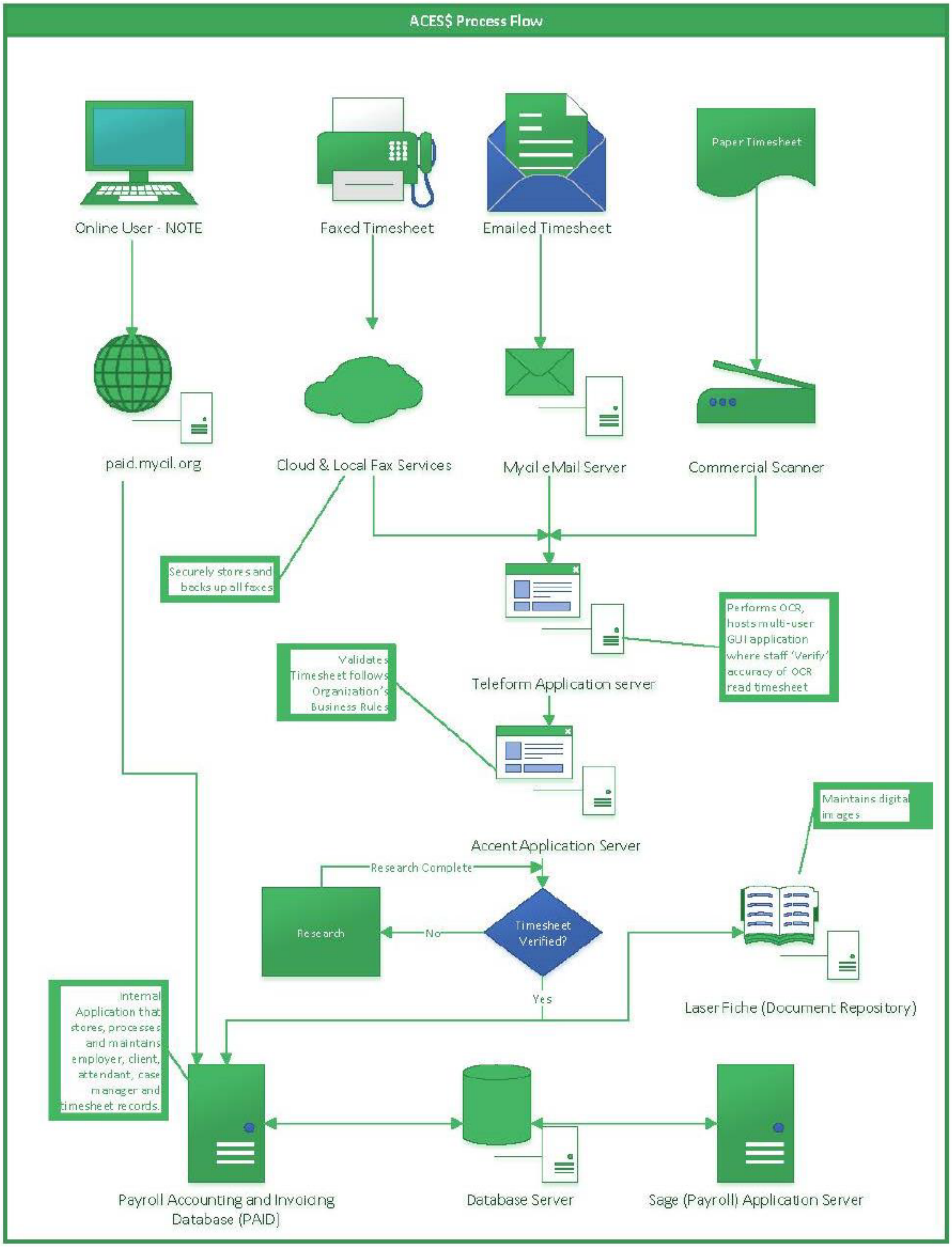
Online Operating Systems

In 2013, ACES$ created proprietary software based upon our experience and subject matter expertise. We call this robust automated payroll processing system, the Payroll Accounting and Information Database (PAID). PAID, and its timesheet module NOTE, is a Participant information and fiscal management system allowing FMS staff to ensure timely and accurate payment for employee services and for billing and reconciliation of claims to and from State agencies for an employee's rendered services. This system, PAID, is an internal web application with restricted access to all but the ACES$ corporate network. Many of the tasks noted in the operational phase or our Work Plan interact with, or are dependent on in some way, the PAID and NOTE systems.

PAID/NOTE are customized for every contract and program we serve. We manage multiple programs of varying sizes with different rules and regulations. We are able to modify our software to accommodate billing processes; claims and reimbursements; state and federal taxes; Unemployment and Workers' Compensation; Patient Share; Employee Overtime concerns; Employee Sick Leave; as well as customized reporting.

Figure 19 below is a flowchart that depicts our systems workflow.

Figure 19: ACES$ Systems and Timesheet Workflow



Since the implementation of PAID in 2013, we have seen a vast improvement in staff productivity, system efficiencies, and our ability to offer additional services. Specifically, we have seen significant growth, in both the number of Individuals served and paychecks cut, without having a proportional increase in our staff. We have a growth plan in place that allows us to track efficiencies and hire additional payroll and tax operations staff, when necessary, as programs grow. However, we have found that our efficiencies maximize significantly through our software, often barring the need to recruit many additional staff. In addition, we are able to track and retrieve information with ease and accuracy. As mentioned earlier, PAID/NOTE enables ACES$ to easily handle the FMS functions listed in this RFP.

Our systems are designed, maintained and customized in-house. We do not have to contract out to have our system modified, nor do we subcontract our system to another vendor. This means any challenges encountered in the implementation of a new program-specific system are able to be resolved efficiently with minimal budgetary and implementation schedule impact. **We customize PAID and NOTE to each programs business rules, requirements and specific validations.**

PAID is a robust system that works in conjunction with NOTE. It reviews and “kicks-out” timesheets, or reimbursement requests, due to over-budget or insufficient funds in real-time. All timesheets and reimbursement requests process through PAID regardless of submission method. This means if a Participant has multiple workers, and one worker prefers to fax their timesheets while the other submits them online, the Participant will be able to see all timesheet submissions and budget history, regardless of the timesheet submission method. This is also true when a Case Manager logs on to our NOTE system to review their caseload.

If a timesheet is “kicked-out”, we hold it for review. Our payroll staff immediately examine the reason for rejection and contact the Participant for correction. That includes, but is not limited to missing signatures, missed deadlines, and over-budgets. We contact Participants immediately, before an issue results in non-payment of their employee. We understand how critical it is for someone to receive their paycheck and how much Participants depend on their workers. ***Figure 20*** shows the Timesheet Kick-out Summary Page in PAID and ***Figure 21*** shows the required Notation Field, where staff must document the reason for rejection, next steps, etc.

Figure 20: Kick-out Summary Screen - PAID

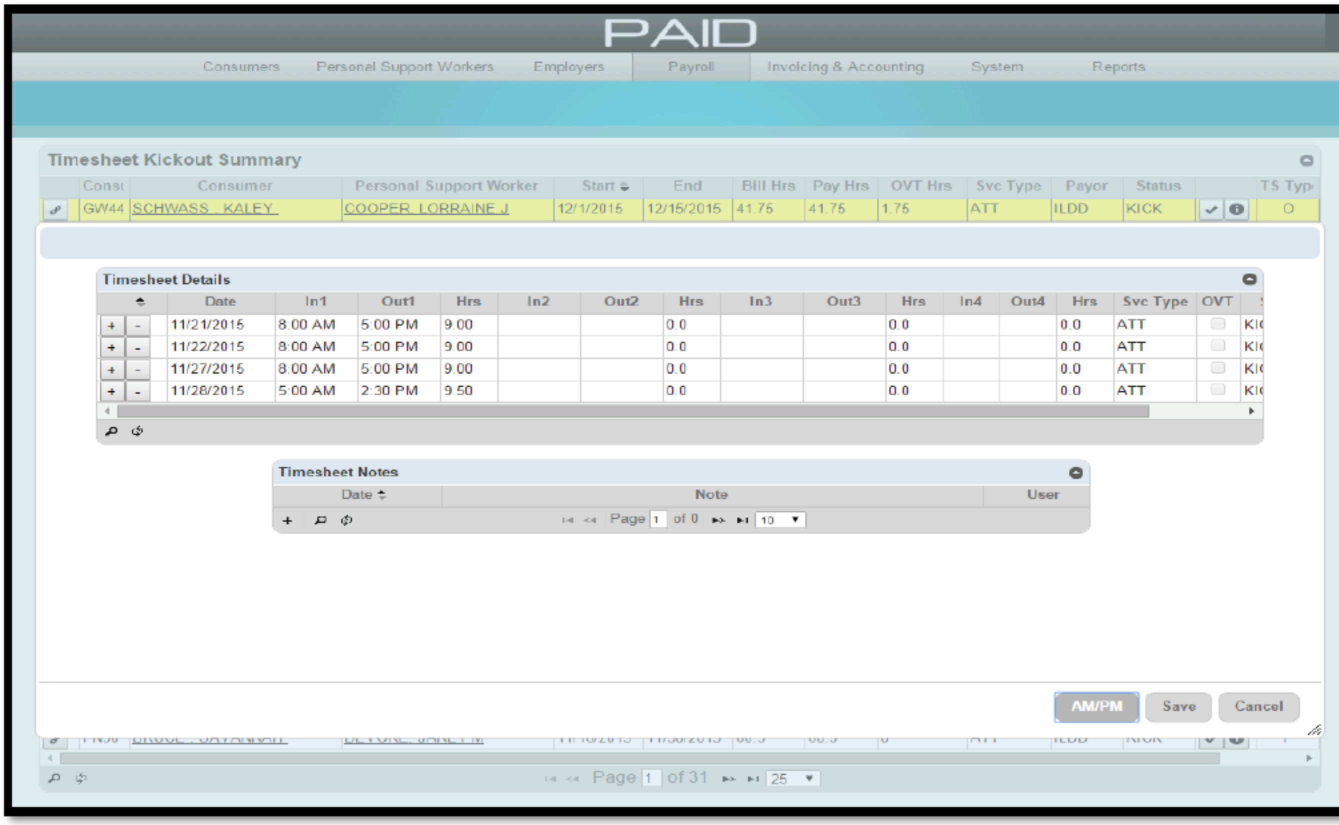
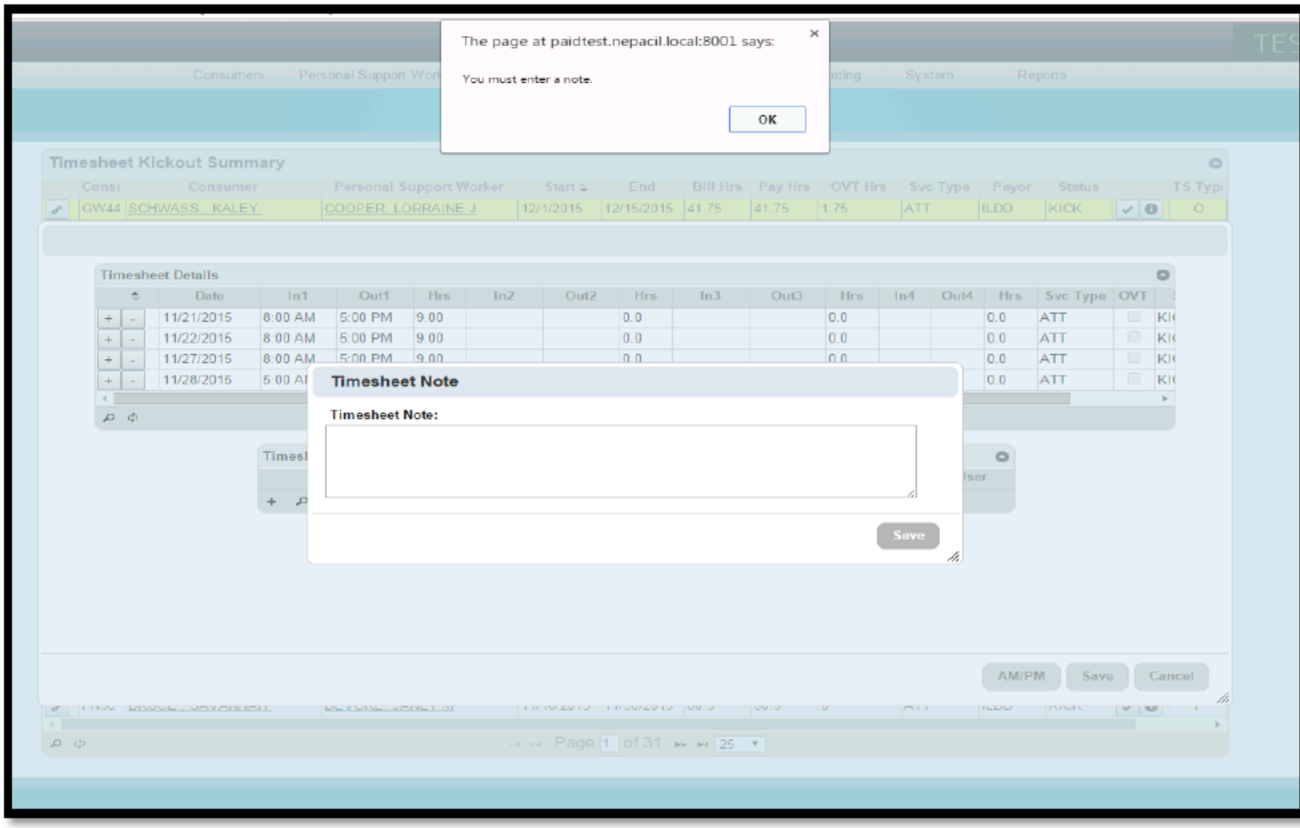


Figure 21: Notation Field - PAID



We encourage you to view demonstrations of our PAID and NOTE systems by using the links below.

- **PAID:** https://youtu.be/-OqjL2MXy6w
- **NOTE:** https://youtu.be/tfBlhioSXQ4

We have provided a list of high-level NOTE functionality in ***Table 6.***

Table 6: NOTE System Capabilities

NOTE System Capabilities	
1.	Real-time budget usage data
2.	Participant allocation data
3.	Certification Period Information
4.	Current Attendant
5.	Participant, Attendant and Case Managers survey link mechanism
6.	Historical Service Utilization Information
7.	Ability to record specific tasks and subtasks performed during working hours based on authorization
8.	Secure role-based environment to allow viewing of appropriate levels of data.
9.	Automated creation of Monthly Participant Expenditure Summary for Participants, Surrogates and Supports Coordinators

10.	Allow Participants, Surrogates, and Case Managers to review hours paid, remaining allocation amount, and total allocation spent
11.	Save, submit, and revise timesheets
12.	Save and submit goods and services reimbursement requests
13.	Allow Participants, Surrogates, and Supports Coordinators to review goods and services paid, remaining allocation amount, and total allocation spent
14.	Allow Participants and Surrogates to verify and correct timesheets
15.	Access training materials
16.	Access contact information for ACES$ staff - including PC remote - support tools to assist Participants directly
17.	Mechanism for Participants/Surrogates to review, reject and approve timesheets with automatic email notifications
18.	Mechanism for Supports Coordinators/Program Managers to review 'held for approval' goods and services reimbursements with automatic email notifications
19.	Allows for paper and electronic generation of forms as required by the Program
20.	Complete any surveys provided by state or ACES$
21.	For Supports Coordinators, ability to fill in common paperwork online and download PDF copies
22.	Safeguards and notifications
23.	Allows Program Officials, Supports Coordinators, and Surrogates with multiple Participants, to view real-time program data with appropriate permissions

ACES$, as the FMS, processes and distributes employee payroll and related federal, state and local employment taxes and insurances in compliance with all coordinating requirements completely, accurately, and in a timely manner.

Secure Documentation Solution (Preferred but not required)

The RFP notes that the following are preferred but not required.

i. Demonstrate the vendor can implement a secure system allowing for the collection and monitoring of additional service documentation. The system shall include:

(1) The ability for an employee to enter a description of the services provided.

(2) A multi-tiered, secure role-based environment to allow viewing of appropriate levels of data.

(3) If web facing (web-based) all traffic must be encrypted.

ii. Examples of vendor experience successfully implementing and maintaining similar systems.

As noted above in ***Table 6***, our system **meets all secure documentation solution preferences.** We customize our system for each contract and program we serve, based on program specific requirements.

Both the EVV mobile app (noted below) and the ACES$ web portal (which supports the entry and approval of online timesheets) are customizable by program. As an example, in one of our currently serviced programs the authorized service type, the rate level, and the tasks being performed are required for each date and time entry; in another program only the date and time are required. Our system can provide any combination of options, including a Notations field (for each date and time entry), depending on program requirements.

In both the EVV mobile app and the ACES$ web portal, the system encrypts the data using AES Rijndael block cipher encryption over a Secure Socket <Layer connection. No data (in code behind or URL string) is shown in plain text. This practice ensures safe and secure web-based communication and processing.

We will work with the State to determine the exact requirements for this specification as they relate to improving the quality of service delivery to Participants and reducing the risk of fraud waste and abuse. This feature would also be integrated into our paper timesheet process. Regardless of submission method, all roles, Participants, Employees, Case Managers, Program Managers, would have historical reporting access to this information based on their access tier.

Electronic Visit Verification System (EVV)

The ACES$ EVV platform is divided into two processes to accommodate Employer/Employee preferences:

1. Mobile Application
2. Telephonic System

With ACES$ EVV solutions, states we serve will benefit by not having to source another provider for EVV, or worry about additional subcontracts with inconsistencies in record management or quality control. When activated, our EVV solution is built into our system and is a fully integrated component of NOTE. ACES$ can provide FMS with, or without, EVV included. When combined, EVV and FMS are tied together seamlessly, and work as one product/service. ***Additionally, it is important to note that our system is designed specifically with self-direction in mind. It allows for the flexibility that self-directed programs require and embraces the Participants independence. Our system is not an adaptation of an agency system or an add-on produced by a software shop.***

We understand that Participants should not be tied to their homes in order to receive services or track their employees' time. We also understand that self-directed services are fluid. Often schedules change based on the preferences of the Participant, not simply the availability of agencies workers, such as in a more traditional model. Therefore, our mobile system allows for easy check in/out, and is not location specific.

Because our EVV merges into NOTE, Program Administrators, Case Managers, Participants and Employees have real-time access to data and robust reporting capabilities without having to use another system. (See Reporting Section for additional information.)

Mobile Application: ACES$ Mobile™

The mobile process has two user types, the Employer and the Employee. When the application is used to log in and out, without the location component, it is simply another means by which to submit timesheets, as noted above. When paired with the location feature (which requires users to agree to allow the mobile application to use their mobile phone's GPS), the system acts as a mobile EVV system, thereby recording the "check-in" and "check-out" location, and requesting approval by the employer.

There are two parts to the daily process:

1. Check-in
2. Check-out

The process is as follows:

- Employee downloads ACES$ Mobile™ and registers
- Employee responds to registration email
- Employee logs in
- Employee selects appropriate Employer (if more than one)
- Employee selects service description (if more than one)
- Employee selects task codes (if program requires it)
- Employee "checks-in"
- Message sent to Employer's mobile phone (as a notification)
- Employer logs in (assumes Employer has already registered)
- Employer clicks on message
- Employer clicks button: Approve, Deny, or Respond
- Message sent to Employee advising of the action taken by the Employer
- This process can repeat several times, depending on the Employer's willingness to approve the Employee's check-in
- Once the Employer has approved the Employees time logged, the check-in process is complete

The same steps occur when the Employee checks out. The Employee can check-in and -out multiple times a day for different service codes. (E.g. Employee comes in for morning tasks, leaves and returns at the end of the day for evening tasks.) Each "visit" is recorded in the PAID database.

When all of the visits for a given pay period are approved, a timesheet is auto-generated for the Employee and it goes through the same validation process as a standard online NOTE timesheet.

If there are any non-approved visits and/or the timesheet fails the validation process, a Consumer Care Specialist will contact one or both of the users (Employer/Employee) and alert them to the error for correction.

As a disability services organization, it is a priority for us to ensure the technologies we build are accessible and meet the needs of our Participants. We often hold initial brainstorming sessions with our own staff, who have a variety of accessibility needs; to make sure we are creating usable software for all. As a result, our mobile system (as well as our traditional online portal) is compatible with a variety of accessibility technologies, including:

- Voice to Text software such as Dragon Naturally Speaking,
- Screen reader software such as Job Access With Speech (JAWS), and NonVisual Desktop Access (free screen reader)
- Screen Magnification software such as MAGic and ZoomText

Additionally, like NOTE, our ACES$ Mobile system is Section 508 compliant. In the event that the employee or Participant are in a location with limited internet access, the application saves and stores the information and immediately uploads once there is an available connection. Our mobile application requires minimal data so that users do not need to worry about having expensive data plans. As an analogy, one month of using ACES$ mobile uses less data than required to download one song from the Internet.

We keep navigation menus short and simple to maneuver so that, regardless of disability, Participants do not find login/approving time cumbersome or stressful.

The flowchart, shown in **Figure 22,** depicts the basic check-in/out process. **Figure 23** shows screen shots from the Employee check-in and check-out screens.

Figure 22: ACES$ Mobile Process Flowchart

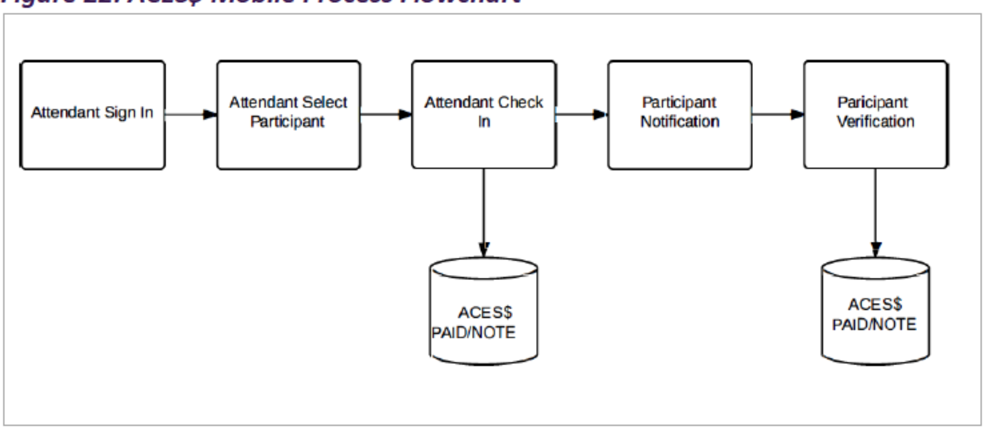
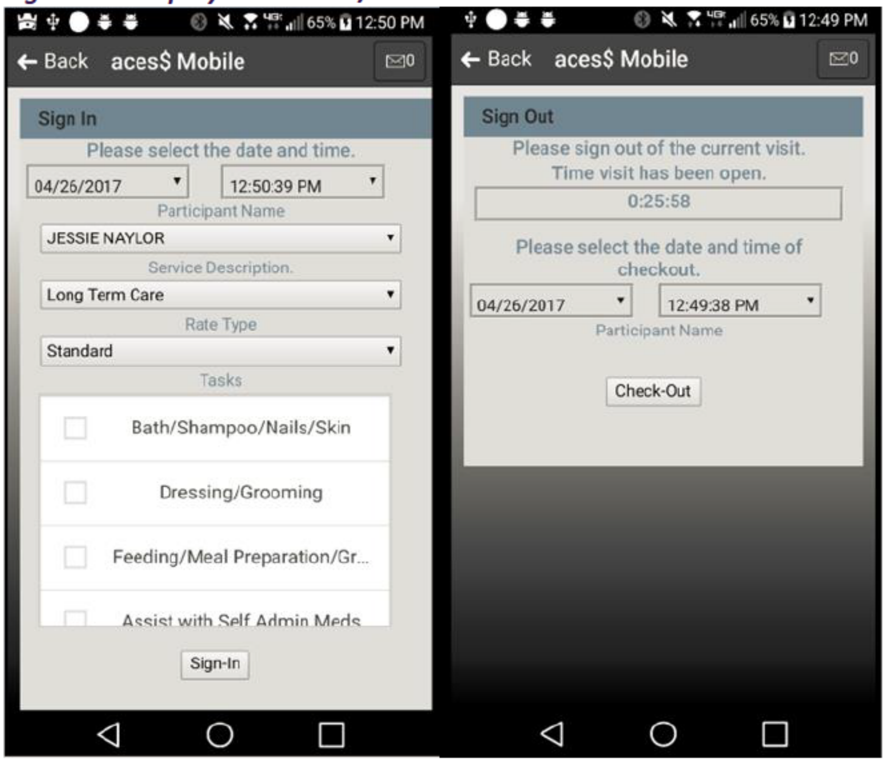


Figure 23: Employee Check-in/Check-out Screen Shot



Telephonic EVV

In the non-mobile, telephonic-based solution, the users both dial into a toll-free telephone line we provide, and sign into an IVR (Integrated Voice Recognition) system. The Employer/Employee logs-in using their social security number and a unique personal identification number (PIN). The telephone system does not contact the Employer, as does the mobile application. Instead, the Employer must call (un-prompted) to verify the time recorded. This solution follows the same high-level process as the mobile application, and the outcomes are the same.

From an IT perspective, our internal proprietary systems utilize modern, secure languages and coding frameworks. ACES$ designed our application frameworks for service atomization and dynamic performance optimization to accommodate the cyclical workflows of FMS payroll processing. Our FMS systems have built-in process auditing, allowing review of data access, printing, reporting, and recording the change process.

EVV Training

Upon contract award, ACES$ will update our current training materials to reflect EVV program specific requirements. The Support Brokers will walk through this process with the Participant and, if available, the Employee, at the time of orientation. We will also host group trainings during implementation to ensure seamless roll out.

We have created ***Table 7*** to account for all EVV requirements as specified in the RFP as well as the 21st Century Cures Act and our systems compliance.

Table 7: EVV RFP and 21st Century Cures Act Requirements

EVV Requirement/EVV Verifications	ACES$ EVV Solution Requirement Compliance/Notes
Verification of type of service performed	Compliant
Participant who received the service	Compliant
Date of service	Compliant
Location of service delivery	Compliant
Worker providing the service	Compliant
Time the service begins and ends	Compliant
System flexibility and adaptability related to internet access and the use of mobile devices, and shall accommodate the system's use in rural areas where internet service may be limited.	Compliant
System shall not have rigid scheduling rules and shall allow for ease of schedule changes based on the Participant's needs and preferences.	Compliant
System shall not restrict the locations in which Participants may receive services.	Compliant
System shall provide a variety of accessible means for Participants to review and approve service hours, using both innovative and standard technologies including: • **Dragon Naturally Speaking** • **JAWS, and** • **ZoomText**	Compliant
System shall provide functionality for the retroactive adjustment of shift start or end times, when appropriate, and facilitate efficient communication and resolution of problems.	Compliant
System shall not constrain Participants' selection of Workers, or impede the manner in which services are delivered through Consumer or Self-Direction.	Compliant
EVV system is "minimally burdensome"	Compliant
The system is HIPAA-compliant and secure	Compliant
Provision of training for Participants and employees who will use the EVV system, which incorporates best practices identified by the U.S. Department of Health and Human Services.	Compliant Will update training on contract award to reflect program variations in terminology or functionality

In designing and/or implementing the EVV system, the vendor shall establish processes to ensure input from Participants, family caregivers, Workers, and other stakeholders. The Contractor shall also participate in stakeholder engagement activities related to EVV implementation and ongoing operation.	We intend to gather input on the design modifications and implementation of the EVV system via the Participant Advisory Group, in addition to any other stakeholder activities related to EVV implementation and ongoing operations.
The 21st C. Cures Act requires EVV to be used for any Medicaid-funded personal care services provided on or after January 1, 2019 for states to maintain full federal match.	We propose to have an initial implementation plan and operational plan drafted and submitted for review during our start-up period. Submission of the draft plan will be by December 1st 2017, with the strategy that we will gather feedback initially from the state followed by input from stakeholders and our Participant Advisory Group. Final version will be provided to the state by March 1, 2018. The plan will contain milestones in preparation of a January 1, 2019 implementation date, and will be subject to prior approval and amendment by the state. It is our intention to begin a phased pilot test period shortly after March 1, 2018. During this phase, we will participate in any state readiness activities to ensure successful Go-live of January 1, 2019.

The Cures Act guarantees 90% federal funding to states for costs relating to the design, development, or installation of an EVV. This applies whether the state operates the EVV system, or a contractor operates the system on the state's behalf. If there was a state decision to cover the cost, or a portion of the cost, of mobile devices for Participants to support mobile application of EVV usage, that could be built into the vendor's PM/PM. Additionally, the Cures Act also guarantees 75% federal funding for the costs of system operation and maintenance. The state may want to consider covering the potential EVV PM/PM with a portion of these funds.

We understand that CMS is required to issue detailed guidance on Cures Act-related EVV implementation this year. We will work with the state and stakeholders to interpret this feedback into a sustainable and productive system that not only meets the requirements, but also supports the needs of the state and its users.

Our system, because of the way it was designed, offers a significant positive to the State in that our EVV system is just that, ours. We have not subcontracted to an outside EVV vendor. Any changes or modifications can be made quickly in house by our development team. It is integrated seamlessly, which means there is no juggling of information, awkward data exchanges, inconsistent reporting, or toggling between systems. The Program Administrators benefit for our robust Monitoring capabilities and real-time data access knowing that the Participants are getting consistent support and customer service when they need it from the SAME provider.

While EVV is not a requirement for this contract, we understand how time-consuming and cumbersome procurement processes can be for a state. With the Cures Act deadline of January 2019 rapidly approaching, our offering would be a single contract with NO additional separate contracts, or subcontracts, at a significantly lower EVV PM/PM rate than standalone EVV providers offer.

Customer Service

What sets us apart, what defines us, is our **outstanding customer service**. Our Participants reach a ***live human being*** on their first call when they phone for assistance. More than 97% of our phone calls are answered immediately by an ACES$ employee who can assist the caller. The remaining time, if we miss a call, we return that call within **minutes**. We have provided phone queue statistics from our Illinois Programs as ***Table 8***.

Table 8: Phone Queue Statistics Illinois Programs

Call Metric	April-17	May-17	Goal
Total calls	4526	4089	
Calls answered	4439	4012	
Answer rate	98.07%	98.12%	97%
Average time to answer	0:00:03	0:00:04	<30 Seconds
Average call time	0:02:50	0:02:46	

We know it is frustrating to be thrust into a world of automation when help is needed, so **it is our policy to be accessible to the people we serve**. We have furnished a list (***Table 9***) of the basic client services we provide.

Table 9: Communication and Customer Service

Customer Service Capabilities
• **A 24/7 toll-free phone number with voicemail capability during non-office hours**
• **Live Customer Support available from the hours of 8:00am – 5:00pm, Monday – Friday**

• **Compliance with all ADA requirements**
• **A 24/7 high-speed fax machine**
• **Provision of contact information on all written materials, enrollment packets, marketing information, website and at the bottom of all email correspondence, to include local, toll-free numbers and TTY line**
• **Internet/email communication (including secure email)**
• **Translation and interpreter services for phone, in-person meetings, and written materials (i.e. Language Line, American Sign Language, and additional services for persons with Limited English Proficiency)**
• **Informational materials available in alternate formats**
• **Online forms compatible with accessibility software such as:** o **Voice to Text software such as Dragon Naturally Speaking,** o **Screen reader software such as Job Access With Speech (JAWS), and NonVisual Desktop Access (free screen reader)** o **Screen Magnification software such as MAGic and ZoomText**
• **Online systems and forms follow logical tab order, alt-text on fields and images and meet section 508 standards (This includes accessibility features on NOTE, such as hotkeys and a convenient and responsive display framework, which represents cleanly on all modern web browsers regardless of device.)**
• **Methods for receiving, returning, and tracking calls from Individuals, Employees, and Case Managers during and after regular business hours, making note of all resolutions that occur through our PRM system (PAID Resource Management system)**
• **Methods for receiving, responding to, and tracking grievances and complaints from Participants and providers within a reasonable time period, making note of all resolutions that occur**
• **Methods for receiving, responding to, and tracking reports of critical incidents, suspected fraud and abuse, as well as time and method requirements associated with reporting. We make note in our tracking system of all resolutions that occur.**

Satisfaction Surveys

We issue Satisfaction Surveys to Participants and Employees to see how we can improve their experience and our performance. We issue annual surveys, and often run one during the first six (6) months of a contract, to see how we are doing. We are able to provide alternate languages, (over 30 languages) at the click of a button, large format, braille or other formats, as needed. Surveys are compatible with screen reader and voice-to-text technology. As an example, we list the results from our December 2016 Illinois Participant Satisfaction Survey in ***Table 10*** below.

Table 10: Illinois Participant Survey Results -2016

	Score					
Survey Question	Very Effective / Very Satisfied	Quite Effective / Quite Satisfied	Effective / Satisfied	Somewhat Effective / Somewhat Satisfied	Not Effective / Dissatisfied	Very Dissatisfied
How effective was ACES$ staff in assisting you during the initial enrollment process?	**95.59%**					
	61.33%	**19.34%**	**14.92%**	3.87%	.55%	0%
How would you rate your experience in submitting timesheets to ACES$?	**94.65%**					
	60.83%	**20.47%**	**13.35%**	2.97%	1.76%	.59%
How would you rate your experience with Personal Support Worker(s) receiving their checks and/or direct deposits?	**96.45%**					
	68.93%	**17.16%**	**10.36%**	1.76%	1.48%	.3%
How would you rate the effectiveness of ACES$ answering your questions or resolving any issues you may have had?	**95.82%**					
	64.78%	**15.82%**	**15.22%**	3.28%	.90%	0%
How would you rate your overall satisfaction with our services?	**97.63%**					
	64.79%	21.01%	11.83%	1.78%	.59%	0%

As previously noted, we provide financial management services in Colorado. Participants have a choice of **three** (3) FMS vendors under the Colorado CDASS program. A separate entity conducted an independent satisfaction survey regarding FMS services. Across all three (3) FMS vendors, **ACES$ ranked the highest** (see ***Table 11*** below). They used a numeric, five-point, Likert rating scale for each question, with five (5) being best or most satisfied, and one (1) being worst or least satisfied.

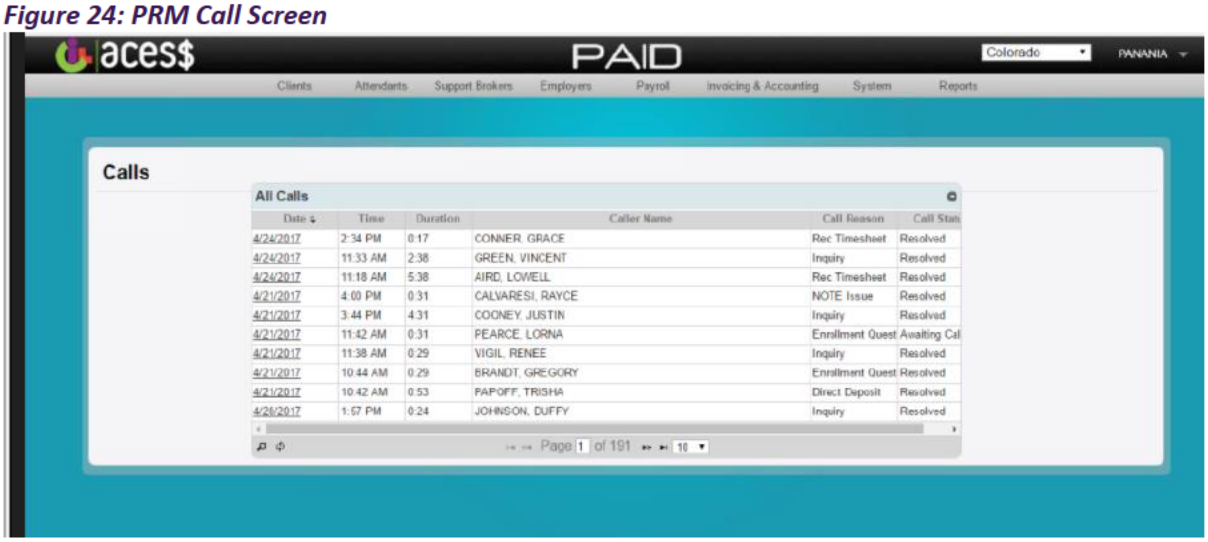
Table 11: Colorado CDASS FMS Vendor Satisfaction Survey 2016

	CDASS FMS Vendors		
Survey Question	**ACES$**	**Alternate Vendor A**	**Alternate Vendor B**
My overall satisfaction with my FMS can be described as :	(average rating) **4.78**	(average rating) **4.63**	(average rating) **4.28**

Call Tracking

We have built an in-house relationship management system called ***PRM*** (PAID Relationship Management). PRM allows for the tracking and logging of all phone calls. PRM integrates fully within our PAID system, allowing for seamless links to Participants, Employees and Case Managers, as appropriate. This means that issues are noted, and resolutions are determined, within the same software portal (***see Figure 24***). ACES$ staff review call status, issue resolution, and call history without the Participant having to tell their story several times, or staff jumping to and from multiple systems. We are also able to track reasons for calls. This resource reveals target areas for improvement or training. For example, if an Individual frequently calls with the same timesheet question, it may be determined additional in-person training from a Support Broker would be helpful.

Figure 24: PRM Call Screen



As is consistent with our internal Grievance policy, ACES$ will respond to complaints or grievances submitted to us within two (2) business days.

Worker Registry

ACES$ has its own Worker registry called **ACES$ *Advantage* Registry™**. We created our registry as a response to our Participants and Direct Care Workers revealing to us that other registries are often out-of-date and/or lack sufficient and accurate information about the Workers. We created an archive, which captures detailed information. We are able to bring together Individuals in need of care with well-matched Employees. This technology assists Individuals in identifying a caregiver who meets their needs, preferences, and geographic location. At the time a new employee completes their paperwork, they are asked if they would like to be on the **ACES$ *Advantage* Registry™**. Should the state wish to use this, provided it does not increase risk of joint employer relationship, we are able to provide this service to the Participants.

ACES$ is able to flag and track a grievance or complaint in the PRM system. We are able to escalate issues as needed. ACES$ provides Individuals and employees with information and a process on how to file a grievance at the time of enrollment. Additionally, we are able to flag calls related to an incident of suspected fraud or abuse. We can track and escalate issues in accordance with our internal processes. We have provided below our general process for problem escalation, and filing a grievance. Information on reporting critical incidents, fraud and abuse is located below.

Issue and Escalation Approach

As detailed in our startup tasks, ACES$ has a specific Problem Escalation Procedure (PEP) plan that reflects the appropriate staff and roles at state.

The process consists of six (6) steps. The staff involved, and the roles they play, largely depend on the issue or action item. For general purposes, we have made basic assignments below.

- **Identification**: The issue identified may come from various sources, such as Consumer Care Specialists (based on feedback from a Participant, Surrogate, Employee, or Case Manager), a Support Broker, payroll, accounting, etc. Depending on the severity of the issue, it will escalate to the director of that particular department. We have previously provided organizational charts with key staff and reporting structures.
- **Validation and Prioritization:** The director of the department is responsible for validating and prioritizing the issue.
- **Analysis**: The director identifies necessary staff and departments to analyze and address the issue. Staff assigned will perform analysis and provide feedback, such as causation, and recommend resolution options.
- **Tracking and Reporting:** The director reports all issues and proposed resolutions to Craig Morrison, VP of FMS Operations. It is his responsibility to report the issue to our CEO, Tim Moran, and together determine if escalation is warranted. Internally, we track and monitor all issues through the PRM system noted in earlier in the Call Tracking section of this response.
- **Escalation:** If escalation is warranted, the issue will be reported to the Contract Manager at the state (or another point of contact as identified by the state). If appropriate, we present resolution options for feedback.

- **Resolution and Closure:** ACES$ staff, identified during the analysis phase, will implement a resolution and close out the issue. If the issue escalated to the state contact, the Program Director will provide the state with ongoing updates regarding progress, changes and resolution status.

Should the state have an issue or concern, they may contact Craig Morrison, VP of FMS Operations. His contact information is as follows:

- **Email**: cmorrison@mycil.org
- **Phone**: (877) 223-7781

Additionally, the state may also contact our Vermont Program Director at the local Burlington office. ACES$ will provide contact information for this individual to the state upon recruitment.

Filing a Grievance

All Participants/Employers have the right to file a grievance in accordance with ACES$'s Formal Grievance Procedure Policy related to fiscal and payroll-related activities, as detailed below.

We make it very clear during the enrollment and training process, those Participants who file a grievance will be free from hindrance or reprisal in their request for settlement. We provide our Grievance Policy in our Employer Packet. Contact information is provided, should they wish to file a grievance. We have the Participant sign one copy for our records, and provide an additional copy for them to keep. An example of the information found in our Wyoming Program packet is below in ***Figure 25.***

Figure 25: Sample Grievance Policy and Procedure

Employer Grievance Policy & Procedure

All Employers have the right to file a grievance related to ***fiscal and payroll activities*** in accordance with ACES$'s Formal Grievance Procedure Policy, as detailed below.

Before filing a grievance you should be sure to work with ACES$ customer service and the Wyoming Program Director, Paige Kelley, to see if you can resolve the issue. You may contact Customer Service Toll Free by calling 1 (844) 500-3815. You may contact Paige Kelley, Wyoming Program Director, via email at pkelley@mycil.org or by phone at 570-344-7211 extension 24101.

Employers and Participants are free from hindrance or reprisal in their request for settlement.

All grievances must be submitted in writing to the **ACES$ VP of FMS Operations.**

The **ACES$ VP of FMS Operations** upon receipt of the grievance will acknowledge its receipt to the Employer in writing within two (2) working days.

The **ACES$ VP of FMS Operations** will advise the Employer of action taken or decision within five (5) working days after the grievance acknowledgement.

If the Employer is not content with the **ACES$ VP of FMS Operations**' response, s/he may grieve the resolution.

The grievance is then sent to the **Chief Executive Officer (CEO)** in writing within five (5) working days of the receipt of the resolution from the ACES$ VP of FMS Operations. The **CEO** will respond within five (5) working days.

If the Employer is not satisfied with the response of the **CEO**, he/she may present the grievance in writing to the Executive Committee within five (5) working days of the receipt of the resolution from the CEO.

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, the grievance is appropriate to be heard before the Executive Committee, the Executive Committee will select a hearing date and inform the Employer involved of such date. Actions taken at this level will constitute the final decision of ACES$.

Submit Grievances To:
ACES$ – VP of FMS Operations
830 South Spring Street
Springfield, IL 62704
ACES$ – Chief Executive Officer/ Executive Committee
1142 Sanderson Avenue
Scranton, PA 18509-2623

Employer Signature: **Date:**

Support Brokers provide training to Participants and employees (as appropriate based on state and program requirement) on abuse, neglect and exploitation and other areas defined as critical incidents. These include how to identify an incident, as well as prevention and reporting, for Consumer direction and self-direction Participants. ACES$ understands that each program may have variations in reporting processes and definitions of incidents. Below, we have outlined our understanding of the process and procedure, including our role.

We understand that critical incident management (CIM) is a vital component in maintaining the health, safety and welfare of HCBS Participants. CIM is a partnership with the state, Case Managers and other providers.

For our purposes, it will be important to have an understanding from the state regarding CIM:

- Definitions of Non-Reportable Events that providers must address internally through their own quality assurance processes;
- Definitions of Reportable Events that must be reported to the state;
- Specifications of the timeframes within which Reportable Events must be reported, to whom, and the reporting process;
- Specifications of the types of Reportable Events that require investigation or review, by whom, the timeframes for such investigations or reviews, and how the individual (and/or family and legal representative as appropriate), providers and others are informed of the results of an investigation or review;
- Definitions of processes for determining if specific Reportable Events are classified as Critical Incidents and the actions that must be taken when such a determination is made;

By doing so, we are able to ensure a strong collaborative process, which enables us to:

  - Track Reportable Events, including those determined to be Critical Incidents; and
  - Trend data to evaluate the nature, frequency and circumstances of Critical Incidents and determine how to prevent or reduce similar occurrences in the future.

Our Support Brokers will train Participants and provide information to Employees, family members, or other unpaid caregivers, of Participant rights and protections. This includes events believed to compromise the health, safety, individual freedom, or quality of life of a Participant.

In our experience, training will emphasize identifying and mitigating risk of harm, while not placing unnecessary restrictions on the freedom and choices of a Participant. Nor does it prevent opportunities for a Participant to achieve increased independence and self-sufficiency as they participate fully in community life. In fact, as part of our internal staff training, Consumer Care

Specialists and Support Brokers discuss this topic to ensure they understand, and know how to respond, to a Critical Incident.

Support Brokers will have a strong understanding of their role and responsibility, as well as the Participants, for ensuring that supports are provided in accordance with each Participant's plan of care. That includes working with the Participant and Case Manager to implement strategies to help mitigate potential risk areas. Staff and Participants will also understand that they are not held responsible if, in spite of appropriate supports and implementation of applicable and reasonable risk mitigation strategies, an incident or event occurs.

As an organization with a Center for Independent Living background, we understand, and are committed to, embracing the "dignity of risk" and recognize that the normal taking of risks in life is essential for personal growth, development, and maximizing quality of life. As a provider, we understand our role in balancing health and safety with happiness, to ensure we all achieve the best possible outcomes within the community and that Participants have the best opportunity for unique and fulfilling lives. Our Support Brokers and robust system validations work hand-in-hand to mitigate fraud, waste and abuse occurrences.

Upon contract award, we will work with the state to establish appropriate linkages to reporting systems. We will work within appropriate communication and reporting lines to report, and support, investigations into what are considered Tier 1 reportable events. We will collaborate with the state to make sure that important information sharing is occurring while implementing any specific reporting requirements and processes into our system, policies and procedures. Additionally, we will internally track all Tier 1 reportable events, as well as those incidents that constitute "non-reportable" events.

Types of events that typically qualify as reportable critical incidents include:

- Abuse - we will update our policies and procedures to reflect any variations and requirements regarding abuse and its defined sub-categories:
    - Physical Abuse
    - Emotional/Psychological Abuse
    - Sexual Abuse
- Neglect - we will take into account any neglect thresholds and probable risk requirements established by the state or individual program.
- Misappropriation of property or funds - our process will ensure that we report on and meet specific minimum value requirements established by the state to define a reportable incident.

We will work with the state to determine what qualifies as a reportable event, and the requirements and variations in reporting processes between Tier 1, Tier 2, and Tier 3 events/incidents or other variations in classification methodology.

Non-Reportable Events include incidents that do not classify as "reportable". Examples of non-reportable events that we track include:

- Allegations of inappropriate of disrespectful communication by a worker not directed to or within eyesight or audible range of the Participant
- Failure to provide services needed but does not meet neglect thresholds
- Minor injury not requiring professional medical treatment/care and is not a direct result of abuse or neglect
- Worker misconduct that falls outside the definitions for Reportable Events and does not result in serious injury or probable risk of serious injury

ACES$ staff will address and track and trend all Reportable and Non-Reportable Events as they arise due to the impact on quality care and quality of life of the Participant.

Our policies and procedures, as well as internal training, will be updated upon contract award to reflect specific state and program reporting requirements.

ACES$ has a vigorous written policy and procedure for handling and reporting all critical incidents of alleged abuse, alleged neglect, recipient death, as well as financial fraud and abuse to the appropriate state and federal offices, as needed. State law determines whom, and how, we report these incidents and we will follow the Vermont Code of Regulations and program guidance. ACES$ will fully cooperate in all investigations of any reportable fraud, abuse, neglect or death, in accordance with applicable standards, rules, and laws.

ACES$'s current policy includes definitions of abuse and neglect, timeframes for reporting, preservation of evidence, and notification of officials, parents and guardians. We will modify these policies to conform to Vermont's program requirements, as appropriate. For example, we will update Tier 1-3 classifications, definitions and variations of reporting procedures. We will determine all state and local policies, contact information and procedures, whether verbal (telephonic or in-person), electronic, or other written forms, for reporting provider and recipient fraud and any type of abuse. Individuals and Employees, as well as Case Managers (if appropriate), receive training from ACES$ regarding the proper procedures for reporting.

Reporting Fraud and Abuse

ACES$ staff are trained to recognize possible Participant and Employee abuse, neglect of Participants, as well as potential financial fraud and abuse and to report issues to the appropriate investigative authority. To report a provider for fraud and abuse, staff are required to notify the Vermont Program Director. We will not share the name of the person reporting the fraud to anyone without his/her permission. At a minimum, we will report potential, or actual, fraud and abuse to the Office of the Inspector General (OIG), the Program Manager and the Case Manager.

We follow specific state procedures for reporting abuse and neglect to include reporting to the protective services unit of the county department of social services in the Individual's county or residence, the local law enforcement agency, or the OIG, as well as the Case Manager and Program Manager. We report incidents within four (4) hours and/or twenty-four (24) hours. Within four (4) hours after the initial discovery of an incident of alleged abuse or neglect, we will report all allegations to OIG's hotline number. Four (4) hour reporting includes any allegation of neglect and abuse, injury or death by an employee that occurs within the home wherein there is suspicion of abuse or neglect.

We report the following information:

- Information about the victim, including name, date of birth, sex, disability, identification number and/or social security number (if known)
- Information about the incident including: what happened, when it happened, where it happened, how it happened and the identification of all witnesses
- Information about the accused (if known) including: name, contact information and if the accused is presently working with or scheduled to be working with the alleged victim within the next seventy two (72) hours
- Information about the complainant including: name, contact information, relationship to the victim and request for anonymity (if applicable)

During Participant/Employer training with the Support Brokers, the OIG hotline number is communicated to Participants and their Representatives (or Guardians) at the time of enrollment and we encourage that phone number be posted in plain sight in each location where Individuals receive services. Once OIG notifies ACES$ that an allegation of abuse or neglect has been received, ACES$ is responsible for notifying the victim or his/her legal guardian (if applicable) and the accused of the allegation within twenty-four (24) hours. If ACES$ is unable to reach the Guardian by phone, a letter of notification shall be sent within twenty-four (24) hours.

If the allegation constitutes abuse or neglect and is within the jurisdiction of OIG, ACES$ will work with the Case Manager and Program Manager to:

- Ensure the immediate care and protection of the victim
- Obtain medical examinations, when applicable, and documentation of same for all injured individuals
- Remove the accused employee from providing personal support when there is credible evidence supporting the allegation of abuse or neglect; report to emergency responders, when necessary
- Unless otherwise directed by OIG, ACES$ and the Case Manager/Program Manager will ensure appropriate responses to the allegation, which may include the need to secure the scene of the incident and preserve evidence

Any allegation(s) or investigation(s) of reports of abuse and neglect will remain confidential until OIG completes and approves a final report. We shall disclose information to OIG concerning diagnosis and treatment for alcohol or drug abuse in accordance with federal regulations. Investigations are exempt from restrictions under the Federal Health Information Portability and Accountability Act (HIPAA). Information concerning tests for human immunodeficiency virus (HIV) and diagnosis and treatment for acquired immune deficiency syndrome (AIDS) is disclosed to OIG only, in accordance with the AIDS Confidentiality Act.

ACES$ will maintain a local investigative case file on behalf of the Individual containing the investigative report and all investigatory materials. After receiving a final report or notification of acceptance from OIG, if the alleged victim is an Individual with a Guardian, ACES$ will inform the Individual, in an appropriate manner, whether the allegation was substantiated, unsubstantiated or unfounded. Final reports of substantiated investigations will be released only in accordance with the Mental Health and Developmental Disabilities Confidentiality Act and the Freedom of Information Act (OIG investigations are governed by this Act). Final reports of unsubstantiated or unfounded allegations will remain confidential, except that final reports shall be released pursuant to Section 6 of the Act, or a valid court order. The identity of any person as a complainant shall remain confidential in accordance with the Freedom of Information Act, unless authorized by the complainant.

ACES$ will provide the following to the appropriate Case Manager and Program Manager:

- Verbal Fraud/Abuse Report*- *Upon discovery*
- Written Fraud/Abuse Report*- *Due within two (2) days of Verbal Fraud Report*

Our Support Brokers train all Participants on what constitutes fraud, abuse and neglect and monitors for signs of critical incidents. Additionally, we are able to provide similar training information for Employers to provide Employees.

Enrollment

Within each enrollment packet, ACES$ provides an informational sheet that includes the ACES$ toll-free number. This sheet includes information on the following:

- Functions of FMS
- Business hours
- Toll free and TTY numbers
- The availability of foreign language interpreter capabilities including American Sign Language (ASL)
- Availability of information in large print, Braille, and other media upon request
- Key staff contacts
- Information on the level of interaction between employees and case managers

In addition to an information sheet on ACES$, the packet also includes:

- Individual as Employer packet checklist
- Individual contact information
- Individual appointment of agent agreement
- Fraud/Abuse Information
- Grievance Policy
- Service agreement between Individual and ACES$
- Timesheet(s) (should they wish to submit by mail, or fax) and Pay Schedule
- Goods and Services reimbursement form(s) (should they wish to submit by mail, or fax)

ACES$ provides Employer and Employee packets to all Participants. The Support Brokers walks through each form with the Individual and, if available, the Employee. The Support Brokers will provide follow-up assistance should the Employee have any questions filling out the paperwork if they are not present during the initial enrollment. The Individual, or their Surrogate, must complete the following forms:

- IRS Form SS-4, Application for Employment Identification Number
- IRS Form 8821, Tax Information Authorization Form
- IRS Form 2678, Appointment of Agent, for signature
- Combined Registration Application Form (CRA)
- Power of Attorney Authorization Form
- Worker's compensation insurance and reporting process
- Signed Individual Service Agreement - by Individual or Surrogate
- Signed Employee Agreement – by Individual or Surrogate and their Employee
- Signed Surrogate Designation Form – if applicable
- Individual Appointment of Agent agreement
- Grievance Procedures
- Timesheet and Payroll schedule
- Goods and Service Reimbursement Form

We provide all essential federal and state forms, as well as agreements and required forms, in our Employer and Employee Packets. We will make any necessary revisions to our enrollment packets and forms, based on program and state requirements during our startup period. At this time, we will also customize forms to reflect Program or state terminology.

The Individual must complete the Enrollment Packet prior to receiving F/EA services. In advance, the Support Brokers pre-populates forms with basic information to ease the enrollment process, much the same way a Case Manager would. We verify this basic information before the enrollment, if possible via a referral form from the Case Manager or authorization/plan of care. ACES$ offers the following options to assist with enrollment packet completion.

Face-to-face enrollment: As noted earlier, ACES$ will send a Support Broker to meet with the Individual and, if appropriate, the Surrogate, to assist with navigating enrollment forms. The Support Brokers will also train on the online system, and submission of timesheets and reimbursement forms. This may be done at the Case Managers office, the Individual's home, the ACES$ office, or another site chosen by the Individual such as a community or senior center. After the Individual or Surrogate have completed and signed all required forms in the Employer Enrollment Packet, the Support Brokers takes all forms back to the office on the same day of the enrollment. If the Individual requests a late afternoon meeting, the Enrollment Agent brings the forms to the office on the next business day for processing.

Telephone/mail-in enrollment: We mail enrollment packets to the Individual's home address. The Enrollment Agent will orient the Individual to the enrollment process and will assist them in completing forms over the telephone. The Individual will send the Enrollment Packet back to the local office for processing.

Online enrollment: Participants may wish to complete the enrollment packet via the ACES$ website by downloading enrollment documents. The website displays the steps necessary and the Support Brokers' telephone number should the Individual have questions or need assistance. The Support Brokers will check email daily for new enrollments.

Once the Individual has selected an Employee, they are required to have the Employee fill out the Employee Enrollment packet. The Employee packet contains information on tax withholding and other forms such as the Employee Agreement, which reviews the roles and responsibilities of the Employer and Employee. This agreement, and all other forms, must be completed and signed. ACES$ will double check and confirm sufficient information has been provided for the I-9 to establish Employment Eligibility Verification. ACES$ will maintain background check results, as per Vermont requirements. Our online system has a method for tracking which background checks are processed, and when, as well as the results. ACES$ will track the Employee's training in a similar way and verify certifications prior to the Employee start date should that be a program requirement. Should there be a requirement for annual training/certifications for workers, ACES$ will notify the Individual and their Employee(s) of imminent training expirations, based on reports generated from training expiration dates. We are able to send notifications at ninety (90), sixty (60), and thirty (30) calendar days before the expiration, or whatever interval DAIL prefers. Once all requirements have been met for the Employee, ACES$ will notify the Individual and they may begin receiving services from the Employee.

ACES$ assists Individuals in completing and submitting the necessary forms to secure a Federal Employer Identification Number (FEIN) to establish themselves as the Employer of Record with both state and federal government. As noted above, ACES$ Support Brokers assist Individuals, and their Surrogates, with all enrollment paperwork including instructions to complete the forms necessary to obtain a FEIN to become an Employer of Record.

We ensure that each new Individual has appointed ACES$ as their Employer Agent by completing the Employer Appointment of Agent form, IRS Form 2678. For Individuals in the Program at the point of transition, we ensure they have revoked the appointment of the incumbent contractor, using IRS Form 2678, and appointed the Contractor, using a separate IRS Form 2678.

During the enrollment session, Support Brokers walk through all applicable forms and assist the Participant with completing all necessary paperwork, including the Appointment of Agent form (IRS 2678). Our Enrollment Agents answer all questions about the process and the responsibilities associated with this and ensure the correct completion of all forms, the **first time**.

Employee Packet

The Employment package for Individuals' Employees includes the following:

- Functions of FMS
- Business hours
- Toll free and TTY numbers
- The availability of foreign language interpreter capabilities including American Sign Language (ASL) and alternate print, large print, Braille, and other media, upon request
- Key staff contacts
- Grievance procedures
- Employee training requirements/checklist
- Employment Relationship Disclosure form
- Information on interaction between Employees and Case Managers and the basic enrollment process
- Employment application which includes an area for specialized training or certifications
- USCIS Form I-9
- IRS Notice 797, if applicable
- IRS Form W-2
- Employee /ACES$ Agreement
- Workers' compensation insurance and reporting process
- Authorization to withhold payroll taxes
- Background check and training verification authorization- *if needed*
- Direct Deposit and Paycard information
- Payroll schedule
- Timesheet

ACES$ does not allow time entry for employees whose paperwork has not been submitted accurately and processed. This includes verification of training and background check results. **An employee is not active in our system until they are fully processed. Our online system immediately kicks-out any timesheet submitted for someone not yet active.**

As part of requirements, before beginning work, each employee must have a criminal background check completed. Therefore, as part of the employee packet procedure, an ACES$ staff person will run all required background checks. Additionally, an ACES$ Support Brokers will verify all certifications are complete and in compliance, and determine any issues that may affect the credentialing of an employee to perform assigned duties. This is complete prior to entering the employee information into our PAID payroll processing system.

At the time of enrollment, we use a referral/contact form to pre-populate many of the basic fields throughout the paperwork. This makes the paperwork process more efficient for both the Participant and their worker.

Training

We understand that the FMS vendor awarded this contract is responsible for developing training materials for self-direction in financial management. (We are capable of meeting and exceeding the requirements set forth in ***RFP Section 2, A Working with Employers and Employees.***) ACES$ provides various levels of training for all contracts we serve. We update our tools and materials to reflect program policy and processes to match the unique needs of each contract. Upon contract award, ACES$ will update our current training materials to reflect the program policies served under this contract. Some of the tools we currently have include:

- A user-friendly Participant budget planning tool (See ***Figures 26-27***)
- Online Training Modules with availability of matching paper-based training materials
- Scheduling and Task Management tools
- Scheduling, Task and Job Description Toolkit
- Back-up Plan Toolkit
- Power point presentations - for use during webinars and in-person meetings

Participants and their Representatives (when applicable) will receive orientation within two (2) business days by their assigned Support Brokers. ACES$ ensures that it educates Individuals in F/EA activities in an accurate, thorough manner. We prepare and present all informational and training materials to the Individuals according to IRS and State (if available) F/EA standards. We provide information on training materials and methods used of ongoing orientation and skills training below.

We will discuss with the state Program Managers if there are any particular issues or compliance concerns and include training areas to address these. Training Module Topics include the following:

- Participant Direction 101
- Roles and Responsibilities within the Program
- Contact Information and Helpful Tools
- Employee Paperwork
- Timesheet Submission, Online System Orientation, and EVV
- Workplace Safety

- Fraud, Abuse and Neglect
- Filing a Grievance

ACES$ tracks completion of all training modules in the Employer and Employee file within PAID. Once completed successfully, we record the date and completion status and issue a certificate of completion should the state wish to make the training modules a requirement rather than simply and encouraged educational tool. If training modules were to be a program requirement the Employers and Employees are not given a "good to go" until these trainings are completed. Once they are completed and all requirements are met successfully, including paperwork and background check completion, they become active in PAID and are able to submit timesheets.

Budget Planning Tool

ACES$ implements an **"Hourly Estimator Budget Calculator" and a "Cost to You" tool** for all our contracts. These tools illustrate the impact taxes have on hourly wage rates, allowing Employers to consider that when determining pay rates. They further assist in determining the number of hours an Employer can afford without exceeding their budget. The Hourly Estimator tool has built-in calculations to help eliminate user error. Our Support Brokers and Consumer Care staff (as needed) use these tools with Participants/Employers during initial training and ongoing consultation.

As an example, below we provide the version we use in Colorado. Please note the taxes and withholdings are reflective of that state. We will update these tools to reflect the requirements of Vermont.

Figure 26: Example of Budget/Hour Estimator Tool

Same Pay Rate for One or More Attendants			
Hourly Rate	Cost to You Rate	Monthly Budget Amount	Estimated Hours of Service
$28.75	$32.72	$2,167.64	66.25

Different Pay Rates for Multiple Attendants			
Monthly Amount	$2,167.64		
	Attendant 1	Attendant 2	Attendant 3
Hourly Rate	$10.00	$12.00	$15.00
Cost to You Rate	$11.38	$13.66	$17.07
Monthly Attendant Hours	65.00	40.00	50.00
Budget Cost	$739.70	$546.24	$853.50
Attendant Budget	$2,139.44		
Remaining Budget	$28.20		

Figure 27: Example of Cost to You Tool

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"Cost to You" Pay Rate Table - Effective January 1st, 2016

The following table is an example which illustrates the "Cost to You" of employing someone.

Hourly Wage	Hourly Cost to You	Overtime Wage	Overtime Cost to You	Hourly Wage	Hourly Cost to You	Overtime Wage	Overtime Cost to You	Hourly Wage	Hourly Cost to You	Overtime Wage	Overtime Cost to You
$ 8.31	$ 9.46	$ 12.47	$ 14.19	$ 12.75	$ 14.51	$ 19.13	$ 21.77	$ 17.50	$ 19.92	$ 26.25	$ 29.87
$ 8.35	$ 9.50	$ 12.53	$ 14.26	$ 13.00	$ 14.79	$ 19.50	$ 22.19	$ 17.75	$ 20.20	$ 26.63	$ 30.30
$ 8.50	$ 9.67	$ 12.75	$ 14.51	$ 13.25	$ 15.08	$ 19.88	$ 22.62	$ 18.00	$ 20.48	$ 26.63	$ 30.30
$ 8.75	$ 9.96	$ 13.13	$ 14.94	$ 13.50	$ 15.36	$ 20.25	$ 23.04	$ 18.25	$ 20.77	$ 27.38	$ 31.16
$ 9.00	$ 10.24	$ 13.50	$ 15.36	$ 13.75	$ 15.65	$ 20.63	$ 23.48	$ 18.50	$ 21.05	$ 27.75	$ 31.58
$ 9.25	$ 10.53	$ 13.88	$ 15.80	$ 14.00	$ 15.93	$ 21.00	$ 23.90	$ 18.75	$ 21.34	$ 28.13	$ 32.01
$ 9.50	$ 10.81	$ 14.25	$ 16.22	$ 14.25	$ 16.22	$ 21.38	$ 24.33	$ 19.00	$ 21.62	$ 28.50	$ 32.43
$ 9.75	$ 11.10	$ 14.63	$ 16.65	$ 14.50	$ 16.50	$ 21.75	$ 24.75	$ 19.25	$ 21.91	$ 28.88	$ 32.87
$ 10.00	$ 11.38	$ 15.00	$ 17.07	$ 14.75	$ 16.79	$ 22.13	$ 25.18	$ 19.50	$ 22.19	$ 29.25	$ 33.29
$ 10.25	$ 11.66	$ 15.38	$ 17.50	$ 15.00	$ 17.07	$ 22.50	$ 25.61	$ 19.75	$ 22.48	$ 29.63	$ 33.72
$ 10.50	$ 11.95	$ 15.75	$ 17.92	$ 15.25	$ 17.35	$ 22.88	$ 26.04	$ 20.00	$ 22.76	$ 30.00	$ 34.14
$ 10.75	$ 12.23	$ 16.13	$ 18.36	$ 15.50	$ 17.64	$ 23.25	$ 26.46	$ 20.25	$ 23.04	$ 30.38	$ 34.57
$ 11.00	$ 12.52	$ 16.50	$ 18.78	$ 15.75	$ 17.92	$ 23.63	$ 26.89	$ 20.50	$ 23.33	$ 30.75	$ 34.99
$ 11.25	$ 12.80	$ 16.88	$ 19.21	$ 16.00	$ 18.21	$ 24.00	$ 27.31	$ 20.75	$ 23.61	$ 31.13	$ 35.43
$ 11.50	$ 13.09	$ 17.25	$ 19.63	$ 16.25	$ 18.49	$ 24.38	$ 27.74	$ 21.00	$ 23.90	$ 31.50	$ 35.85
$ 11.75	$ 13.37	$ 17.63	$ 20.06	$ 16.50	$ 18.78	$ 24.75	$ 28.17	$ 21.25	$ 24.18	$ 31.88	$ 36.28
$ 12.00	$ 13.66	$ 18.00	$ 20.48	$ 16.75	$ 19.06	$ 25.13	$ 28.60	$ 21.50	$ 24.47	$ 32.25	$ 36.70
$ 12.25	$ 13.94	$ 18.38	$ 20.92	$ 17.00	$ 19.35	$ 25.50	$ 29.02	$ 21.75	$ 24.75	$ 32.63	$ 37.13
$ 12.50	$ 14.23	$ 18.75	$ 21.34	$ 17.25	$ 19.63	$ 25.88	$ 29.45	$ 22.00	$ 25.04	$ 33.00	$ 37.55
				Maximum Hourly Rate				$ 39.30	$ 44.72	$ 58.95	$ 67.09

A breakdown of the costs included in the "cost to you" column are as follows:

6.20%	FICA
1.45%	Medicare
0.60%	Federal Unemployment Tax
2.13%	State Unemployment Tax
3.42%	Workers Compensation
13.80%	**TOTAL**

You are certainly free to pay an employee any amount you desire as long as your wages are within the State's funding parameters. Current minimum wage is $8.31 per hour.

You can calculate a rough "cost to you" by multiplying the wage you wish to pay by 113.80%
Example: $9.00 113.80 % = $10.24

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Online Training

ACES$ currently has an online training program. We developed this program to support a statewide contract. To establish online training, we worked with Emily Miller, formerly with Maryland Department of Aging (MDOA), where she created the Maryland Options Counseling Training and Credentialing Program as part of MDOA's Options Counseling Grant Initiative. The Administration for Community Living (ACL) references the Maryland program as a model to develop Options Counseling training standards at the Federal level. We collaborated to develop a tool that addresses common areas of concern and confusion for Individuals who begin to Self-direct their care and budget. Our training incorporates objectives, outcomes, and competencies. We have recently hired Ms. Miller as a full-time staff member. She now serves as our Director of Training and Consumer Care. We plan to have her attend the staff trainings during the Transition Phase as one of our key trainers. Our online tool tracks results so we may identify problem areas and offer additional support or clarification.

Our trainings:

- Are designed to be informative, useful, and provide tracked data
- Modules may be completed in 10 - 20 minutes or less
- Integrate competency questions, which require Participant understanding prior to completion
- Provide a Certificate of Completion at the conclusion, which can be printed for the Participants records (if lost or misplaced, we will provide a duplicate copy). A record of completion is maintained in the Participants' file
- Track progress. All modules must be complete prior to starting services, should that be a program requirement
- Are available for follow-up review and refresher training
- Are easily accessible in over 30 languages

Our Consumer Care contact information is available at the beginning and end of each module, should the Participant have questions or need additional support. For Vermont, we will also add Support Brokers contact information. Support Brokers are able to monitor status and responses within the training for their caseload and follow up as appropriate. We will inform Participants that we can assist with interpreters and alternate formats.

To access examples from our online training, please click on the links in the outline below. **Please note, the information and images reflect the Wyoming program population and policies.** Additionally, Wyoming is flexible regarding competency demonstration. ACES$ will adapt the training program to reflect Vermont's populations, program and policies, as well as implement thresholds for correct and incorrect answers, according to Vermont Program preferences. We are able to provide alternate languages (over 30 languages at the click of a button), large format, braille or other formats, as needed. Training is compatible with screen reader and voice to text technology.

- **Module I: Making it Happen: Arranging for Services, Supports and Goods** https://www.research.net/r/V6TZ997
    - Introduction to Self-direction
    - How to hire help
    - Hiring: what to ask
    - What rate to pay
    - Wages: responsible budgeting
    - How to find a worker
    - Hiring family members: what to ask

- **Module II: Enrollment Process and Packets** https://www.research.net/r/V6XFJFS
  The Support Brokers reviews this information. This module provides an overview of the process and forms required. It is not a substitute for the Support Brokers.
    - Who is the Support Brokers?
    - Enrollment Process and Timeline
    - Enrollment Packets
        - Employer Packet
            - Required forms
            - Purpose
        - Employee Packet
            - Required forms
            - Purpose
- **Module III: Timesheet Submission, Payroll and Ongoing Budget Management** https://www.research.net/r/V6NCYX8
    - What is the "payroll schedule"?
    - What if I am late and miss the pay period deadline?
    - What is "supplemental pay"?
    - Difference between submitting by mail, fax, email and online timesheets
    - How to submit by mail, fax, email
    - How to submit through the online portal
    - How my hourly rate may be impacted by overtime and taxes/withholdings
    - Correcting timesheets
    - Submitting only for hours worked
    - Tracking and managing my budget
- **Module IV: Self-direction Goods and Services** https://www.research.net/r/V6N57RX
    - How to purchase and submit receipts/invoices for goods and services
        - What items are typically allowable under the program?
        - Am I approved to purchase goods or services?
        - Working with my Case Manager to create a Spending Plan that includes the goods and services I need
        - How to purchase items on my approved Spending Plan
        - How to submit receipts and requests for reimbursement
        - When do I use a vendor?

        - Vendor paperwork

- **Module V: Fraud, Abuse and Grievances** https://www.research.net/r/V6F2L5Q
    - What is fraud?
    - What is abuse?
    - What is neglect?
    - How to report it and who can you turn to
    - What is a grievance?
    - How to report it and get resolution
- **Module VI: Health, Safety and Training** https://www.research.net/r/V63LSVJ
    - What types of training does my employee need?
    - Where do they get training?
    - Is training required?
    - Health and Safety in the workplace

ACES$ can easily create additional modules or topic areas, as needed. As with all of our contracts, training will be updated to reflect state and program variations. Upon contract award, we will work with the state Program Managers to identify any areas of concern where additional training is required. Prior to providing training, we will submit all training materials for review and approval.

Our online system updates quickly. Should a policy change, or should the state wish to reinforce a program rule with additional extra training, we are able to accommodate quickly without requiring outside providers.

A paper-based version of our training programs(s) is also available. This information is downloadable from our online portals Document Center and our Support Brokers can provide a hard copy during in-person enrollments.

Additionally, our staff can provide trainings and orientations for Program Managers and Case Managers at the state office, case management location or another location. Should it be easier for program staff schedules, or a refresher training is necessary, these meetings can take place via a web-enabled call.

Scheduling, Task Management and Job Description Toolkit

Our Scheduling, Task Management and Job Description Toolkit assists the Participant in identifying their criteria for the position they are hiring for by taking them through following steps:

1. Identify the tasks that must happen.
2. Identify the tasks they need, but are flexible about when they happen.
3. Identify, and compare, what they want assistance with, to what they are able to pay for through their approved plan of care.
4. Develop a draft schedule to help them determine their preferences for when tasks are performed and how many hours their employee will need to perform those tasks.

5. Identifying the skills and qualities for employees carrying out these tasks.
6. Writing their job description with the information they have collected.

The Scheduling, Task and Job Description Toolkit consists of several worksheets to help a Participant navigate their needs and interpret them into a functioning job description. Our Support Brokers will work with the Participant as they use the tools. The Toolkit is flexible and serves as an optional resource, based on the needs and capabilities of the Participant. A separate Toolkit is developed for each program, designed to incorporate specific program requirements. We have provided samples of the worksheets within the toolkit below as ***Figures 28-31***. An example of our Scheduling, Task and Job Description Toolkit is found as ***Attachment A***.

Figure 28: Task Worksheet

TASK TOOL/WORKSHEET

Personal Care/Mobility/Health and Safety							
	Step 1	Step 2	Step 3				Add to Job
Tasks	Required	Preferred	Time Needed to Perform Task (hours)	Frequency (day / week)	On ISP	Paid Task	Description
Bathing							
Washing Hair							
Shaving							
Nail Care							
Skin Care							
Oral Care							
Bowel Care							
Bladder Care							
Dressing							
Feeding							
Meal Preparation							
Medication Management							
Medication Assistance							
Medication Reminders							
Transfers							
Positioning							

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Figure 29: Task Schedule Worksheet

Homemaker/Chore Services Task Schedule								
Tasks	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Total hours
Vacuuming	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
Washing Dishes	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
Laundry	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
Yard Care	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
Snow Removal	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
Making Bed	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
Dusting	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
Cleaning Kitchen	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
Cleaning Bathroom	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
Washing Floors	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
Shopping	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
Trash Removal	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	☐AM ☐PM	
Total Hours								

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Figure 30: Employee/Worker Preferences Worksheet

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Finding the Right Employee Personal Preferences Worksheet			
About my Worker/Skills	Very Important	Somewhat Important	Does Not Matter
Male			
Female			
Older			
Night person			
Morning person			
Social			
Talkative			
Quiet			
Discrete			
Compassionate			
Likes animals			
Non-smoker			
Punctual			
Time management			
Flexible schedule			
Work commitment			
Building relationships			
Communication skills			
Teachable (willing to learn)			
Action oriented			
Problem solving			
Physical strength/ coordination			
Housekeeping			
Scheduling/reporting			
Record keeping			
Meal preparation			
Transferring/Positioning			
Bathing/Dressing			
Certifications (CPR etc.)			

Figure 31: Job Description Worksheet

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Job Description Worksheet

Job title:

Supervised by:

Job summary:

Work schedule:

Note: The worker must only work the hours that are listed above.
Any additional hours ***will not be paid*** *unless approved by your employer.*

Wages: Wages for this position are $ _____ per hour.

Total hours per week:

Benefits:

Qualifications:

Duties and responsibilities:

Back-Up Plan Toolkit

Our Back-Up Plan Toolkit provides context and resources for Participants to create a Backup Plan that will work for them. Support Brokers will work with Participants to customize their plan and troubleshoot areas of which they may be unsure. (see **Attachment B**)

The toolkit is designed to help Participants:

- Plan for the Unexpected
- Prepare a Back-Up Plan for Employee Absence

The toolkit provides:

- Employee Quick Contact Sheet ***(Figure 32)***
- Emergency Planning Considerations
- Emergency Information/Plan Worksheets ***(Figures 33-37)***

In some states we serve, the Case Manager works with Participants to develop a back-up plan. If that is not the case, we are happy to update this tool to reflect the various program terminology and provide as a resource.

Figure 32: Back-up Worker Contact Sheet

Back-Up Worker Contact Sheet

Worker Name	Phone Number(s)	Availability	Notes
	Home: Cell:		
	Home: Cell:		
	Home: Cell:		
	Home: Cell:		

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Figure 33: Emergency Plan Disability/Medical Related Emergency

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Emergency Plan

Disability/Medical Related Emergency:		
Who to Call: (please list in order of priority)		
1. Name:	Relationship:	Phone Number: Home: Work: Cell:
2. Name:	Relationship:	Phone Number: Home: Work: Cell:
3. Name:	Relationship:	Phone Number: Home: Work: Cell:
4. Name:	Relationship:	Phone Number: Home: Work: Cell:
Important Information and Plan:		

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Figure 34: Non-Emergency Plan Disability/Medical Related Emergency

Non-Disability/Medical Related Emergency:

Who to Call: (please list in order of priority)		
1. Name:	Relationship:	Phone Number: Home: Work: Cell:
2. Name:	Relationship:	Phone Number: Home: Work: Cell:
3. Name:	Relationship:	Phone Number: Home: Work: Cell:
4. Name:	Relationship:	Phone Number: Home: Work: Cell:
Important Information and Plan:		

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Figure 35: Emergency Plan Severe Weather/Natural Disaster

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Severe Weather/Natural Disaster Related Emergency:		
Who to Call: (please list in order of priority)		
1. Name:	Relationship:	Phone Number: Home: Work: Cell:
2. Name:	Relationship:	Phone Number: Home: Work: Cell:
3. Name:	Relationship:	Phone Number: Home: Work: Cell:
4. Name:	Relationship:	Phone Number: Home: Work: Cell:
Important Information and Plan:		

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Figure 36: Emergency Plan Power Outage

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Power Outage Related Emergency:		
Who to Call: (please list in order of priority)		
1. Name:	Relationship:	Phone Number: Home: Work: Cell:
2. Name:	Relationship:	Phone Number: Home: Work: Cell:
3. Name:	Relationship:	Phone Number: Home: Work: Cell:
4. Name:	Relationship:	Phone Number: Home: Work: Cell:
Important Information and Plan:		

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Figure 37: Emergency Plan Allergies and First Responder Contacts

List Allergies
1.
2.
3.
4.
5.
6.
Medications:
Notes:
Additional Phone Numbers
Police Department:
Fire Department:
Poison Control:
Supports Broker:
IF IN DOUBT, DIAL: 911

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Payroll

We are able to track and retrieve information with ease and accuracy. As mentioned earlier, PAID/NOTE enables ACES$ to easily handle the F/EA functions listed in this RFP.

PAID is a robust system that works in conjunction with NOTE. It reviews and "kicks-out" timesheets, or reimbursement requests, due to program business rules prohibiting over-budget or insufficient funds in real-time. As mentioned, NOTE and PAID validations and requirements are customizable to meet all of Vermont's DDS, CPCS, ASP, TBI, CFC (including the Flexible Choices [FC] option and the Moderate Needs Group [MNG]) rules and regulations. All timesheets and reimbursement requests process through PAID, regardless of submission method. This means if a Participant has multiple workers, and one worker prefers to fax their timesheets while the other submits them online, the Participant will be able to see all timesheet submissions and budget history, regardless of the timesheet submission method. This is also true when a Case Manager logs on to our NOTE system to review their caseload.

If a timesheet is "kicked-out", we hold it for review. Our payroll staff immediately examine the reason for rejection and contact the Participant for correction. We contact Participants immediately, before an issue results in non-payment of their employee. We understand how critical it is for someone to receive their paycheck and how much Participants depend on their Workers.

Payroll Schedule

The Employer Enrollment Packet, provided at the time of orientation, includes information on the Pay Dates Schedule. The Individual is instructed that there are two pay periods per month, the first being the 1st through the 15th, and the second being the 16th through the end of the month. At the end of each pay period, the Individual submits their timesheets to ACES$ for payroll processing. ACES$ operates a semi-monthly payroll cycle. ACES$ payroll staff will process all fully completed timesheets that are in the office by *the 4th at midnight and the 19th at midnight,* in compliance with Federal and State Departments of Labor (DOL) regulations. The deadline for a compliant timesheet's inclusion in a regularly scheduled semi-monthly payroll is close of business the day prior to the payroll's pay date. This allows ACES$ time to run final payroll reports and submit federal tax deposits in accordance with IRS Publication 15 (Circular E). Timesheets received within the prescribed submission timeline sometimes cannot be included because they require correction(s) from their original form. Examples of necessary corrections include, but are not limited to:

- Client budget overages
- Missing, or otherwise improper, signature(s)
- Incorrect time calculations, etc.

Timesheets that are corrected to a payable status by close of business five (5) calendar days following the regularly scheduled bi-monthly pay date, will be processed in that week's supplemental payroll.

While many FMS providers only cut payroll checks every other week, ACES$ provides a **supplemental payroll** for those Individuals unable to get their timesheets in on time, or who may have had to make corrections. **ACES$ processes payroll checks weekly.** We realize that in this economy many live paycheck-to-paycheck and that Individuals rely on their employees. By providing this additional supplemental service, we ensure a less stressful Employer/employee relationship.

Should an employee not receive a check we have a process in place to cancel the check and replace it. We understand timeliness is often critical for employees when it comes to payroll. ACES$ has in place a policy and procedure for un-cashed checks. For each state we work in, we update this procedure to reflect requirements and procedures established by the State Treasurer.

Tax Operations

ACES$ serves as the reporting agent for the government Fiscal/Employer Agent, as defined in section 3504 Agent Employment Tax Liability (REG 137-36-08-1). As a Section 3504 Agent, ACES$ shares liability with the Employer regarding the acts of withholding, reporting and paying of federal employment taxes for wages paid by the Agent for the Employer. Additionally, ACES$ further shares liability with the Employer regarding the Employer's Social Security, Medicare and Federal income tax withholding responsibilities. This includes Revenue Procedure 70-6, 1970-1 C.B. 420, as modified by January 13, 2010 Proposed Notice of Rulemaking: *Section 3504 Agent Employment Tax Liability* (REG 137-36-08-1) and any other revenue procedures, notices, or subsequent publications promulgated by the IRS, including Revenue Procedure 2013–39.

Specific end-of-year activities performed by ACES$ include:

- Updates to common law employer and qualified employee address or phone numbers prior to mailing out tax information in January of each year
- Processing refunds of over-collected FICA for eligible common law employers and qualified employees in accordance with IRS and State directives
- Maintaining documentation related to FICA refunding in each applicable common law employer and qualified employee file
- Processing, filing and distributing IRS Form W-2, *Wage and Tax Statement* for all qualified employees, and in accordance with IRS instructions, for agents. As part of this process, the total gross payroll per the Form W-2 is reconciled to the calendar year's total gross payroll
- Verifying that each qualified employee's social security number matches the name and date of birth information obtained from SSA's *Business Services Online* prior to submitting IRS Form W-2 to SSA each calendar year

- Maintaining copies of the federal copy of Form W-2 and related documentation in each qualified employee's file
- Processing and filing IRS Form W-3, *Transmittal of Wage and Tax Statement,* as appropriate
- Maintaining copies of IRS Form W-3, as appropriate, in the FMS organization's file
- Processing any returned, qualified employee payroll checks, vendor or small unlicensed provider payments, in accordance with Unclaimed Property Laws
- Maintaining copies of Unclaimed Property-related documentation in the qualified employee, vendor or small unlicensed provider's file

We will revise this process as needed to reflect any specific Vermont filings, withholdings, or related processes.

Goods and Service Processing

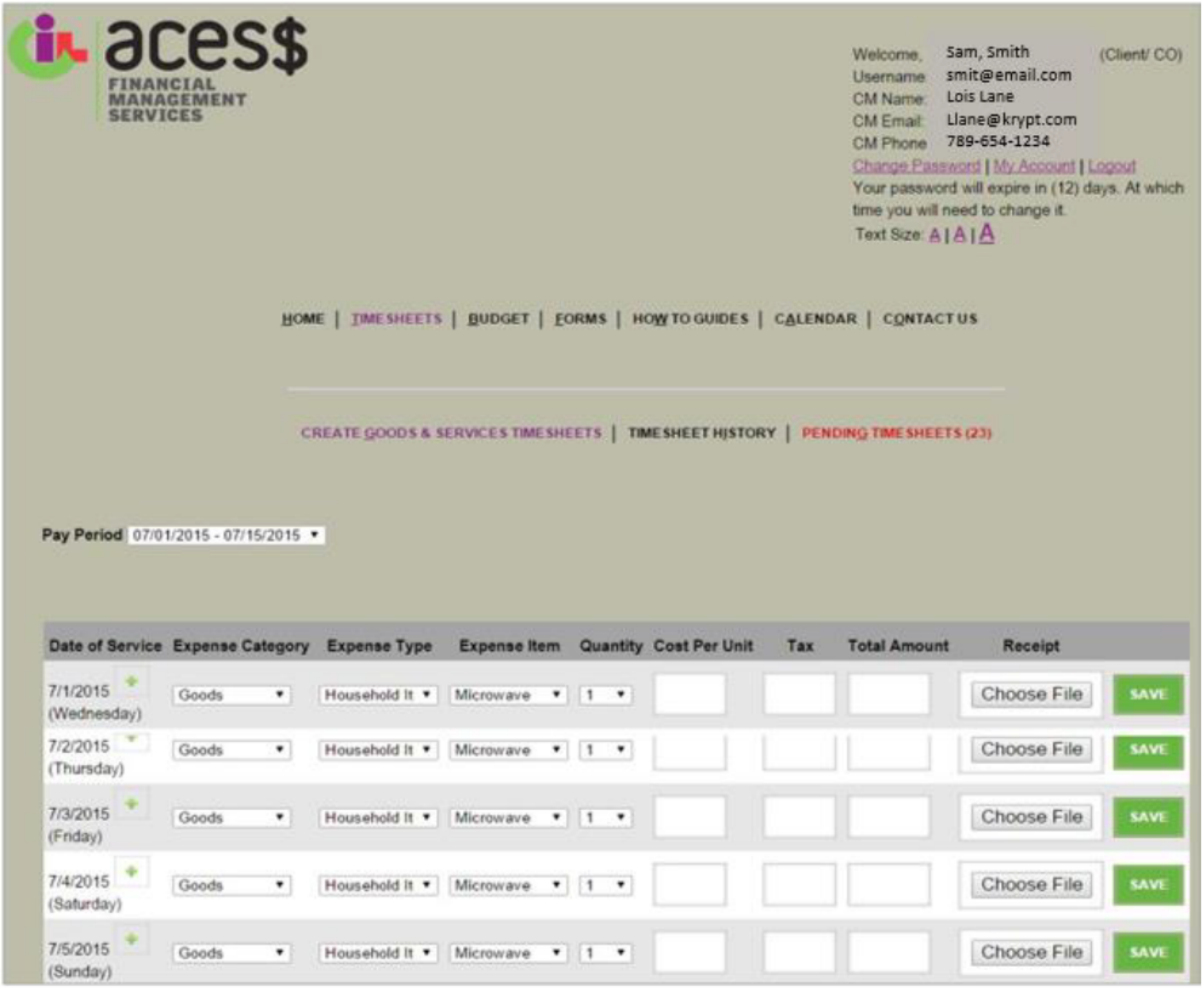
Process and Track Payments for Approved Individual-Directed Goods and Services

ACES$'s Accounting and Payroll departments receive, verify, process, and pay all reimbursement requests and invoices through the PAID system for payments made to Individuals or vendors in accordance with the Individual's authorized plan, as well as program and state requirements.

Our system has the capability to view, track expenditures and submit receipts and invoices for authorized goods and services, to our online system. We have set customizable thresholds, holds, alerts, and reporting mechanisms to allow for flexibility and monitoring while further enabling Individuals to manage their budgets and purchases of pre-approved items.

The ACES$ Goods and Services system enables an Individual with a receipt for a good or service, such as non-medical transportation, documented on their approved plan, to submit the expense and upload a copy of their receipt. Our system will verify it is an approved purchase prior to reimbursement. Individuals may also mail or fax a reimbursement request. Our online system shows available funds that may be used for goods and services. It also lists approved items on their service plan for which they may submit reimbursement requests. We are able to generate reports on goods and services, to include the number of checks cut and for what specific purchase. We can send this information to the Participant, Case Manager, or Program Manager based on the state's preference. We have provided a screen shot of a portion of our Goods and Services Portal in NOTE as ***Figure 38*** below. The drop down menu options become pre-populated based on their approved plan. Upon contract award, we will work with the state to identify the steps and processing methods for approval, submission and reimbursement of purchases and update our internal procedures as necessary. We provide this type of service for a number of our states and are able to advise Vermont on areas of concern and best practice methods.

Figure 38: NOTE Goods and Services Reimbursement Request



Billing

ACES$ has a systematic process in place to bill for services rendered. The process includes utilization of our PAID system, a proprietary record management system, which ensures timely and accurate payment for Participant services. PAID is also responsible for the billing and reconciliation of claims, to and from state agencies, for Participant services. ACES$ is reimbursed for its services by billing for Participants served on a monthly basis. PAID creates and generates invoices, following the file specifications provided.

ACES$ will submit an administrative invoice monthly (or an alternate frequency per Vermont's determined requirements), which includes the number of current Participants and new

Participants; number of current Employees and new Employees; names, Participant ID, Contract ID and Employee Provider Number for each Participant and Employee. We will only submit claims to the state, as applicable, and pay Employees for those services authorized by the state and satisfactorily performed by Employees. We will work within state's required format/process and include Medicaid provider ID numbers on all submitted claims.

ACES$ will submit electronic claims submission file in the 837i format to the state within the required timeframes and will reconcile and document any discrepancies between the PAID/NOTE system, payments made to an Employee, and claims submitted for reimbursement. We will perform reconciliations on a weekly basis or at the frequency preferred by the state. We will work with the state to determine the format and submission method required for claims, should that vary from this process. We will submit claims within the required timeframe. ACES$ will perform adjustments/corrections of claims within one hundred and twenty (120) calendar days of date of service, or alternate timeframe based on the states preferences.

Our NOTE portal will allow the state, Case Managers and Participants to review information on the units of service authorized, utilized, and remaining balances. We track a receipt of funds within our PAID system and maintain a dedicated bank account for the deposit of service funds.

We have a similar system in place for claiming administrative services. We will submit an administrative invoice monthly per the state's prescribed requirements, which includes at a minimum: number of current Participants and new Participants; number of current Workers and new Workers; names, Participant ID, and Worker Provider Number for each Participant and Worker.

ACES$ has a detailed process and workflow developed to address how we interact with state agency systems for authorizations and claim submissions within our policies and procedures. We are able to modify the process, in any way, to meet Vermont's current or desired process. We plan to discuss options with the Program Managers and Billing staff upon contract award to determine the most mutually efficient process. All internal processes and systems used will meet requirements outlined in the RFP. We will also provide respective Program Managers with a monthly summary report (see ***Reporting*** section) of all services provided. We will work with respective program billing staff to resolve any issues with submitted invoices in a timely manner that meets specified timeframes.

Financial Strength

ACES$ has the financial strength to work with Vermont should we be awarded this contract. We have experience with very large programs that require the same, if not larger, advancement of authorized funds. We possess more than sufficient unencumbered reserves to maintain a minimum of two (2) months of payroll cycles (best practice) for Employee services, as well as goods and services provided to program Participants. ACES$ has **never** required a state agency to pay us in advance for program payroll, services or fees, nor will we. We feel this is a poor business practice and damaging to the States with which we work. We have provided our most recent Financial Audit as **Attachment C**. While providing this is not a requirement of the RFP, we feel it is a best practice to provide transparency to the states with which we contract. ***(Addresses RFP Requirement Section 2, Q. Cash Flow.)***

Evaluation and Performance Measures

We understand that the state will establish a process for evaluating our performance during the contract period in accordance with performance measures listed within the RFP. We have provided a summary of our internal QA/QI process in this section to demonstrate how we evaluate our own performance relative to the RFP requirements for the scope of work as a whole as well as the requirements set forth in **RFP Section 2. W Evaluation and Performance Measures.** We are happy to work with the state and respective Program Managers to develop evaluation measures that effectively assist in monitoring our performance within this contract. ACES$ values transparency and efficiency. Our NOTE system enables Program Administrators access to real-time data and reporting mechanisms. We have a number of standard reports and are able to easily provide ad hoc reporting to fulfill the needs of the contract. We have summarized our Quality Assurance/Quality Improvement (QA/QI) process below.

ACES$ has a detailed QA/QI process that includes oversight of all contract requirements and deliverables, such as accuracy and timeliness of FMS duties, reporting and billing. For example, we review payroll on a bi-weekly basis for accuracy and timeliness. For every state we do business in, we develop a QA/QI matrix (see ***Attachment D*** outlining all contract requirements, FMS standards, performance measurement/frequency, performance threshold, and the internal review process. Each matrix minimally covers the following areas:

- Enrollments and Terminations
- Customer Service and Communication
- Training
- Reporting
- Payroll, Accounting and Tax Operations
- Billing
- Policies and Procedures

We are able to provide the state contract managers with a completed copy of our QA/QI matrix on an annual or quarterly basis, as they feel appropriate.

We have provided an example of the Payroll, Accounting and Tax Operations Matrix for Wyoming as ***Attachment D***. ACES$ bases the performance thresholds on either internal best practice or contract requirement. Our policy necessitates that anything below a threshold requires a corrective action. Our audit frequency, often significantly more aggressive than the state requirement, allows us to catch an incident and address it, well before it becomes a recurring problem.

QA Monitoring Activities

Methods for monitoring performance against pre-established indicators within the QA/QI Matirx will include, but not limited to, the following:

- Random Selection and Review of Participant Files
- Review of adherence to and variances in implementation of the Participants' authorization and Participants usage and payroll issued
- Review of Metrics dashboards (i.e., data on indicator performance)
- Special Studies as determined by the Department
- Participant satisfaction surveys
- Case Manager and Worker Satisfaction (Personal Worker and other vendors as needed) surveys
- Review of PRM, Star-2-Star metrics
- Review of action items and resolutions from Participant Advisory Committee Meetings, Focus Groups and Stakeholder meetings

Each contract requirement has a specific audit frequency, process and threshold for compliance established within the Matrix. See example of provided as ***Attachment D***. We have provided a two-row screenshot of the matrix for quick reference below as ***Figure 39***.

Figure 39: Screenshot of QA/QI Matrix Sample

A	B	C	D	E	F	G	H	I	J
Reviewer:	**COO, Craig Morrison, Diane**	**Review Frequency**	**Bi-weekly, Monthly, Quarterly**						
Requirement	**Performance Measurement**	**Performance Threshold**	**Review Process and Sample Size**	**Compliant: Y/N**	**Compliant: Current Process/Docume**	**Not Compliant: Reason and**	**State Input Needed: Y/N**	**Date of Review**	**Reviewer Notes**
Number and percent of payments accurately made to Employees based upon all timesheets with an authorized signature, established rate of pay, and taxes deducted accurately.	Bi-weekly	98%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued. (% of payroll issued was incorrect.) Number and percent of payments accurately made to Employees based on all timesheets with an authorized signature, established rate of pay, and taxes deducted	Y	Reviewed sample of 10 for number of issues /errors in payroll issued. - see notes			6/5/2017	sample of 10 clients chosen. 5 for Sept/2016, and 5 for March/2017. All documents reviewed for these ten clients for compliance with payroll / accounting / tax ops.
Employees are paid within the minimum and maximum rate limits set by the program and match the current Participant/Employee rate form on file.	Bi-weekly	98%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued. (% of payroll issued was incorrect.) Review (no longer a max rate on BHD rates only LTC).	Y	Reviewed 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued.			6/5/2017	
Employees are not paid overtime	Bi-weekly	98%	Department/Staff Responsible for	Y	Reviewed 10 random			6/5/2017	

Customer Serv. & Communication | Reporting | Payroll, Accounting, Tax Ops | Billing | Policies ...

QA/QI Accountability Structure

ACES$ has a detailed internal audit policy and procedure, which we maintain and customize per contract in our policy and procedure document.

CEO

Tim Moran, CEO, oversees the fiscal and administrative functions as they relate to the quality assurance/quality improvement program. Responsibilities include:

- Annually reviews the Quality Assurance/Quality Improvement strategy, the annual QA/QI work plan, the Annual QA/QI Matrix and additional reports and information as required.
- Provides feedback and recommendations to the Quality Improvement Committee (QIC) relative to resource allocation, standards, performance indicators and outcomes, summary reports, Client issues and any issues of concern.
- Addresses information systems needs necessary for data collection and analysis of performance.
- Works with the state to address reports of financial fraud and abuse, physical and/or emotional abuse, neglect, exploitation, appeals and consumer dissatisfaction, should these problems arise.

Quality Improvement Committee

The CEO delegates responsibility for the routine oversight of the plan's quality improvement activities to the Quality Improvement Committee (QIC). The QIC is the cross-departmental entity with accountability for the implementation, coordination and integration of all quality improvement activities for ACES$. The responsibilities of the QIC include, but are not limited to:

- Provide program direction and continuous oversight of quality improvement activities for FMS, waiver services, customer service, client satisfaction, client safety and internal controls.
- Evaluate the both the QA/QI process and the contract via the QA/QI Matrix bi-weekly, monthly, quarterly, or annually (depending on frequency requirements) and assess the overall effectiveness of the program. Make recommendations based on this evaluation.
- Submit the QA/QI strategy, annual QA/QI work plan and annual evaluation of the QA/QI program to the Board of Directors and the State for review and approval.

- Review and approve ACES$ policies and procedures annually.
- Keep abreast of and review best practices in the delivery of Client-directed supports and services, including FMS.

The QIC will meet, at a minimum, quarterly and will receive and review reports related to compliance with federal and state regulatory requirements and internal operational controls. QIC will review at a minimum the following:

- Demographic data on the cultural, linguistic and assistive technology needs of Clients served
- Quality indicators/internal operational controls (data on accuracy and timeless of operations, adherence to individual allocation, spending patterns, etc.)
- Customer service metrics [Average Speed of Answer (ASA), Call Abandonment Rate (AR)
- Complaints and appeals
- Incidents of fraud, abuse, neglect, exploitation
- Enrollment and disenrollment data
- Client and provider satisfaction results
- Number and type of training and re-training requests
- Status of corrective action plans

Membership of the QIC includes:

- Chief Executive Officer
- Chief Financial Officer
- VP of Administration
- VP of FMS Operations
- Director of Research and Development
- Director of Payroll
- Director of Tax Operations
- Director of Training and Consumer Care
- Program Managers

Participant Advisory Group

ACES$ will operate a Participant Advisory Group (PAG) for this contract, meeting all necessary stakeholder requirements. The PAG will meet on a quarterly basis for the first year (or more frequently as needed) to review new materials, provide guidance on addressing Participant concerns and evaluate methods for improving operational performance. All meetings notes including participants, action items and resolutions will be recorded, and maintained for audit purposes. The state will receive a copy of the notes for each meeting respectively, on a quarterly basis.

Quality Assurance/Quality Improvement Oversight Lead

ACES$ has designated the VP of FMS Operations as the lead for oversight of QA/QI activities. This individual will chair the QIC and oversee the coordination of reporting and monitoring activities. Each Department Manager is accountable for collecting data against performance indicators/internal controls, maintained within the QA/QI Matrix to the QIC. All ACES$ staff are trained on the organizations performance metrics; **quality is everyone's responsibility.**

Technology to Support QA/QI

In February 2013, ACES$ invested in a new and robust automated payroll processing system referred to as PAID. PAID is an information and fiscal management system allowing FMS staff to ensure timely and accurate payment for FMS services and for billing and reconciliation of claims to and from state agencies for rendered services. Within PAID there are a multitude of internal and external reporting capabilities. For each contract, we develop custom reports, in addition to stock reports, to support internal and external monitoring and oversight functions.

As a result of PAID, our online portal, tracking and verifying the accuracy and timeliness of billing practices and payroll processes and detecting potential fraud becomes a simple task. (RFP Section 2. W, (1)) PAID will automatically "kick-out" instances of potential fraud based on internal validations preventing faulty payment from the start. Therefore, the examples referenced in the RFP below are a non-issue. (RFP Section 2. W, (5) a-c.)

a. *Employees billing duplicate hours for multiple employers or programs*
b. *Hours submitted exceeding the possible number of hours in the day*
c. *Employers billing overlapping hours for multiple employees*

Our reporting capabilities in PAID allow us to generate a report to show Employers who demonstrate frequent or ongoing problems in the completion of payroll paperwork, non-payroll payment requests, or non-compliance with the required payroll process. (RFP Section 2. W, (5) d.) We are able to isolate these individuals and target them for retraining or other action as required by the program. Reports will be provided to the state as per the required frequency. (See ***Reporting*** Section.)

Our Participant, Case Manager and Employee Satisfaction Surveys, along with tracking and reporting with PRM, allow us to assess our success or need for improvement in providing assistance, support, and relevant education to new participant employers and employees. They assist us in successfully serving individuals with limited English proficiencies and cultural differences. We are able to provide alternate language surveys (over 30 languages) at the click of a button, including large format, braille or other formats, as needed. Surveys are compatible with screen reader and voice to text technology. (Addressing RFP Section 2. W, (2-4).

ACES$ will regularly monitor program participation volume as it relates to administrative costs associated with contract management to ensure that the contracted maximum payable is appropriate given actual volume of participant activity projected over the life of the contract. ACES$ will report results materially different from expectations and/or normal operations to the state as discovered. ACES$ will otherwise provide the state this analysis on a quarterly basis to facilitate monitoring. (Addressing RFP Section 2. W, (6).

Additionally, we will grant access and give view rights to the state Program Managers enabling them to monitor all Participants served through their respective programs. This enables Program staff to query and review, in real-time, budget amounts, payroll dates, employee hours, goods and services purchased, payroll expended in that period for each employee, total payroll amount, and the balance remaining in each monthly allocation to date.

Work Plan

In this section, we describe the proposed approach for producing each required element, including a high-level description of the method used to produce the elements described in Section 2 of the RFP.

The following Implementation/Work Plan section includes the approach and tasks required to address the Scope of Work, manage the project, accomplish required objectives, and meet the states' project schedule. This plan includes a detailed explanation regarding how we will meet the requirements outlined within the RFP in addition to other necessary tasks. This section includes a narrative of our implementation strategy, including transition from the existing vendor, as well as ongoing operations, followed by a Microsoft Project Work Plan outlining key tasks and timeframes in ***Figure 47.***

We understand these programs are operational, and the current vendor's contract ends on January 31, 2018. Our goal is for services to begin February 1, 2018, after a contract start date and two-month transition period beginning on December 1, 2017. The tasks outlined in this work plan reflect those required for us to become operational and meet program requirements, as well as tasks to transition existing clients, prior to the February 1 start date. We have outlined a transition in which a number of our start up tasks overlap.

Our intention for this contract is to be operational and providing existing Participants, as well as newly enrolled Individuals and their Employees, comprehensive services consistent with the various program requirements, on or before the "Go-Live" date. For planning purposes, we are indicating an award date of September 18, 2017, and a contract start date of December 1, 2017. The Transition Phase begins immediately upon the contract start date. We understand that the contract award and commencement dates are not definitive; we are prepared to adjust our plan and timeline accordingly. (We are hopeful that the contract start date, if awarded this contract, can begin earlier than December 1 to provide additional time to transition Participants. Transitions can be overwhelming for Participants and their employees. We always prefer to give them more time whenever possible.) We list these dates on our timeline, as well as task start dates, number of calendar days to complete each task, and completion dates. We have purposely included buffer time to ensure we are ready before the Operational Go Live date of February 1. We allow time for Knowledge Acquisition and Transition, as well as systems training and testing between ACES$ and State staff during the month of December and January.

Please note: We address many RFP requirements and processes in this section. We highlight the required RFP Work Plan tasks throughout our work plan. We address the tasks as they occur in our timeline and have cross-referenced them back to the RFP. We update any variation in general procedures as part of our implementation process. The areas addressed in our work plan meet the RFP Requirements.

Project Start-Up

The assumption for the project start is that work will commence on the effective date (once a Contract is signed and Notice to Proceed received). We have made a presumption, for planning purposes, that the effective date will be December 1. We realize this is not an official start date until the award is made and Notice to Proceed issued and, therefore, may change.

START-UP PERIOD Goal I - Complete Required Tasks Prior to Operational Start-Up

Our first goal will be to prepare our organization for the requirements we must meet prior to the Operational Start Date of February 1, 2018. Relevant tasks for ***Goal I*** include the following activities:

Task 1 - Project Kick-off

Upon contract award as the FMS vendor, ACES$ will arrange an in-person meeting with the state Contract Managers, Program Coordinators, other personnel involved in administering the Program, and stakeholders whom State feels should be present. The ACES$ Staff will likely include the Chief Executive Officer, Chief Financial Officer, VP – FMS Operations, Vice President of Administration, and Director of Research and Development. Other team members can join the meeting via teleconference. The purpose of this "kick-off" meeting will be to review and update the draft ACES$ implementation plan (shown as ***Figure 47***), seek clarification regarding the contract expectations, if necessary, and establish a communication strategy and general schedule for ongoing weekly meetings with the state, key partners, and other relevant stakeholders. Items for the state's review and input during the kick-off meeting include the following:

- Start-Up and Implementation Work Plan
- Proposed Staffing and Roles
- Communication Plan and Project Management
- Information Systems Updates and Key Players

We will review, with the state, a list of ACES$ staff and their corresponding roles within the contract. Additionally, we will review the Communications Plan and determine which external entities are involved in the program and their level of participation in communications and outreach. These may include stakeholders, union representatives, Case Managers, Administrative Entities, CILs, and other relevant providers that are Participant access points.

During the kick-off meeting, ACES$, and the state staff will review program regulations and requirements. This includes the process for tracking and reporting for evaluation and contract monitoring. We will discuss EVV integration and timeline options. We will also document the appropriate contacts to assist in confirming the variation between the various programs specific requirements. We will begin to determine a process for establishing opportunities for common procedures across the waivers. We will decide how best to communicate the change in FMS vendor to the Participants and their Providers. ACES$ will discuss the potential impacts on FMS processes (if relevant) and update tasks and procedures, as appropriate. We understand that the current vendor as limited online timesheet processing and budget monitoring capabilities. We will discuss with the state online portal training opportunities for program administrators, Case Managers, Participants and Employees.

Task 2 - Revise and Submit Project Work Plan/Start-Up Implementation Plan

During the kick-off meeting, ACES$ will review with the state our proposed Work Plan, which includes the start-up period, transition phase, and operational period of the contract. Based on feedback obtained during this meeting, ACES$ will modify the Work Plan tasks and activities, as needed, and submit the revised plan to the state. We will use this as the foundation for our Start-Up Plan.

Task 3 - Communication Plan and PEP (Problem Escalation Procedure)

During the kick-off meeting, ACES$, and the state will review our Communication Plan and Problem Escalation Procedure. The Communication Plan delineates what sharable information is, identifies key audiences, and designates periods for communication, as well as methods for information dissemination. (For proposal evaluation purposes, we will supply an example of our Communication Plan upon request.) We will update the plan to include a specific Problem Escalation Procedure (PEP) plan that reflects the appropriate staff and roles at the state. We provide a summary of our PEP plan in Issue and Escalation Approach within the Technical Capabilities section of this response.

Task 4 - Business Continuity/Disaster Recovery Plan

Meeting RFP Requirement (Section 2, V. Other Duties. 10)

ACES$ has in place a current Business Continuity Plan. During the start-up period, we will review the plan to determine areas that may need to be adjusted or updated. Once revisions are made, ACES$ will submit the plan to DIDD and/or MCOs for review and to maintain a copy for their records.

Task 5 - Training Plan

ACES$ has a Training Plan and will provide an updated version to the state during the start-up period to review and provide feedback. The Training Plan consists of the proposed methods for training all Participants, Case Managers, state staff, as appropriate. This will allow sufficient time to make any adjustments and revisions the state thinks necessary, in order to finalize the Plan well before the start of training. (For space efficiency purposes, document provided upon request.)

Task 6- EVV Implementation Plan

Meeting RFP and Cures Act Requirements for EVV

We propose to have an initial implementation plan drafted and submitted for review during our start-up period. Submission of the **draft plan** will be no later than **December 1, 2017**, with the intention that we gather feedback initially from the state, followed by input from stakeholders and our Participant Advisory Group. **Final version** will be provided to the state on or before **March 1, 2018**.

While updating the design and/or implementing the EVV system, we will establish processes to ensure input from Participants, family caregivers, Workers, and other stakeholders. We will also participate in stakeholder engagement activities related to EVV implementation and ongoing operation. We intend to gather input on the design modifications and implementation of the EVV system via the Participant Advisory Group, in addition to any other stakeholder activities related to EVV implementation and ongoing operations.

It is our intention to begin a phased pilot test period shortly after March 1, 2018. During this phase, we will participate, as required, in any state readiness activities to ensure successful Go-live of **January 1, 2019.**

Task 7 - Closeout Plan / Turnover Services

Clearly, should ACES$ be awarded this contract, we will work diligently to maintain it. However, as a best practice and an assurance to the states with which we work, ACES$ has developed a Closeout/Turnover Plan, should our contract end. We will update this plan upon contract award and submit for approval, should the state wish to review it. Our current plan has all the essential steps, timelines, and milestones necessary to transition FMS services fully to another vendor, as well as staff/role designations within the transition process. This includes a transition coordinator who will ensure that all steps and milestones are complete within the necessary timeframe. (For space efficiency purposes, document provided upon request.)

Task 8 - Update Outreach Materials and Operating Systems

Upon the effective date, ACES$ will immediately begin to update internal operating systems, as well as marketing, training, and other outreach materials. During the kick-off meeting, we will work with the state to identify personnel that should play a role in reviewing these materials/systems, and provide any technical specifications needed.

Together we will ensure that all FMS outreach materials accurately reflect the Vermont FMS delivery system requirements, prior to distributing them to existing and new Participants and Employees. We will review our website and consumer care procedures and make any required or relevant modifications.

Task 9 - Refine Policy and Procedure Manual

Upon contract award, we will refine our policies and procedures to include any Vermont FMS requirements. As part of this process, we will revise and update the following areas:

- Refine FMS policies and procedures
- Update Quality Assurance Policies and Procedures (an example of a QA/QI matrix located in ***Appendix A***)

For all contracts, ACES$ maintains up-to-date policies and procedures that include all federal and state tax and labor regulations and requirements, as well as best practice accounting procedures. Our policies and procedures manual incorporates all programmatic and regulatory requirements. We customize this manual for each program and update it to reflect the regulations and requirements that vary by program or state. We do this annually (at a minimum) and as regulations and requirements change.

As an example, we have provided a sample of our Table of Contents from our Colorado Manual below (as ***Figures 40-44***) to further illustrate the services we provide are established processes and industry best practices. For a more detailed reference, we have supplied an excerpt from one of our policies below as well as a link to obtain a complete copy of our current Colorado FMS Policy and Procedure Manual ***(http://mycil.annkissamprojects.com/node/1151)***. ***Please note: a temporary username and password is provided as a separate document uploaded as part of this response.*** As noted above, we will modify this manual to ensure that all of our policies and procedures are relevant to Vermont, as we do for all states with which we work.

Figure 40: Policy and Procedure Manual Table of Contents

- ⊟ Colorado Policy and Procedure Manual for F/EA Services
  - ⊞ General Policies
  - ⊞ Accounting
  - ⊞ Establishment of Participants as Employers of Workers
  - ⊞ Establishment of Workers as Employees of Participants
  - ⊞ Establishment of Vendors as Goods/Service Providers for Participants - Not Applicable
  - ⊞ Individual Budgets
  - ⊞ Issuing Payments to Workers & Vendors
  - ⊞ Pay and File Taxes on Behalf of Participants
  - ⊞ Year-End Tasks
  - ⊞ Other Tax Responsibilities
  - ⊞ Workers' Compensation - Not Applicable
  - ⊞ Reporting
  - ⊞ Retire and Revoke Account Numbers and Authorization
  - ⊞ Customer Service
  - ⊞ Participant Complaints and Grievances
  - ⊞ Transfer Participants
  - ⊞ Service Claims
  - ⊞ Administrative Task Claims
  - ⊞ Fraud

Figure 41: Expanded view of "Issuing Payments to Workers and Vendors" Section of the Table of Contents

Home › Colorado Policy and Procedure Manual for F/EA Services ›

Issuing Payments to Workers & Vendors

View | Edit | Outline | Clone

Submitted by KBROWN on Thu, 03/23/2017 - 10:56

- Collect and Date Stamp Timesheets & Invoices
- Review Each Timesheet for Accuracy and Completeness
- Review Timesheet for Compliance with Budget and Program Rules
- Pay Worker in Accordance with Applicable Rate for Each Approved Service Code
- Submit Payments to Workers
- Budget & Utilization Research
- Adjust Payments Issued in Error
- Issue Stop Payments and Replacement Checks for Checks Reported Lost or Stolen
- Monthly and Quarterly Reconciliation of Payroll Payments
- Post Payroll Journal Entries to General Ledger
- Pay Workers in Accordance with Overtime, Wage, Hour and Pay Day Rules
- Process Payments for Goods & Services Vendors - Not Applicable
- Withhold Taxes from Employee Pay and Calculate Employer's Taxes

‹ Operate as a Medicaid Enrolled Provider (when applicable) | up | Collect and Date Stamp Timesheets & Invoices ›

Figure 42: Sample Sub-section from 'Issue Payments to Workers' Policy and Procedure

Submit Payments to Workers

Policy:

1. ACES$ pays workers, withholds and calculates applicable worker and employer taxes and files and deposits taxes with applicable government agencies.
2. ACES$ ensures that all workers have been properly paid by performing a weekly reconciliation of the payroll edit register.
3. ACES$ pays workers and vendors by one of two methods: by paper check mailed to the worker or vendor, or by direct deposit into the worker's or vendors authorized bank account or pay card.
4. Each check includes the signature of the ACES$ Chief Executive Officer (CEO). The CEO is one of two signatories on the program bank account; the other signatory is the President of the Board of Directors. ACES$ maintains the CEO signature block image in a password protected, secured location within the organization's check writing software. Only authorized staff have access to the signature block image

Figure 43: Sample Sub-section from 'Issue Payments to Workers' Policy and Procedure, Continued

5. A remittance advice is submitted with every payment. If the worker or vendor is paid by paper check, the remittance advice is attached to the paper check. If the worker or vendor is paid by direct deposit, the remittance advice is mailed, or emailed, to the worker or vendor separately. Each remittance advice includes the following information:
    - Participant who received services
    - Gross wages this pay period
    - Gross wages year-to-date
    - Net wages this pay period
    - Federal income tax withheld this pay period
    - Social Security tax withheld this pay period
    - Medicare tax withheld this pay period
    - Earned Income Credit this pay period
    - Other deductions (itemized) this pay period

Procedure:

Payroll staff implement procedures to complete the following tasks:

1. Print checks with the applicable check date
2. Get signature on checks
3. Print remittance advices with checks
4. Verify addresses on checks/envelopes
5. Stuff checks/remittance advices in envelopes
6. Mail checks with postage date on, or before, published pay day
7. Create electronic funds bank file for direct deposits
8. Upload electronic funds file to the ACES$ bank
9. Manage "pre-notes" as needed
10. Get confirmation that direct deposits have been accepted
11. Mail/email remittance advices for direct deposits
12. Store check information

Figure 44: Sample Sub-section from 'Issue Payments to Workers' Policy and Procedure, Continued

Internal Controls:

The internal controls used by ACES$ to monitor this process establish responsibility, segregate duties, document procedures and ensure independent internal verification.

1. ACES$ Payroll Department reconciles payroll account to ensure that accurate payments are debited from the account.
2. Chief Executive Officer is one of two signatories on the program bank account; the President of the Board of Directors is the other signatory.
   - ACES$ maintains Chief Executive Officer signature block for checks in a password protected, secure location
   - Only authorized staff have access to CEO signature block
3. On a quarterly basis, the Quality Assurance Coordinator contacts a random sample of 25 workers and/or vendors to inquire if they regularly received a remittance advice with their payments.
   - ACES$ Quality Assurance Coordinator completes a findings control document and submits it to the Director of Accounting for review and signature.
   - Based on the findings of the Quality Assurance Coordinator, we develop and implement a corrective action plan.

Task 10 - FMS Web-Based System * RFP Requirement/Deliverable

We perform this task in conjunction with ***Task 7 - Update Outreach Materials and Operating Systems.*** This includes updating our web-based proprietary payment and billing operating systems, PAID and NOTE, in order to add any possible items that we must track per the Program requirements. We will work with the state to further define requirements for a narrative field as part of this task.

*Task 11 - Update and Create Required Reports** RFP Requirement/Deliverable

Update process and reports to meet RFP Requirements regarding reporting and oversight.

Once we update internal systems, ACES$ will work with the state to set up the reports in a useful and user-friendly manner. The Reporting section of our technical response provides additional detail on the reports ACES$ currently provides. We will adjust reports to reflect program administrator/Participant needs and provide them in any frequency required. We can format into reports any new data elements we integrate into our tracking system. We will confirm the format and requirements for these reports prior to development. We are able to transmit reports via File Transfer Process (FTP) or secure email.

Task 12 - Update Employer/Employee Enrollment and Vendor Packets

ACES$ has both Employer/Employee Enrollment and Vendor packets which meet industry best practice standards. We will review the contents and update the information according to Vermont FMS and State program requirements. The packets will need minimal updates to be consistent with Vermont programs, such as general reference changes and revisions to service categories and codes. We write our packets for 6th grade readability.

Once we have made all necessary updates, we will submit the packets to the state for review, and approval, if appropriate so they are in place for Transition.

Task 13 - Satellite Office Space and Staffing

Upon contract signing, we will begin staffing with the hiring of our Vermont FMS Program Director. Once hired, our Vermont FMS Program Director will oversee the program implementation along with our VP of FMS Operations Craig Morrison. Our Vice President of Administration will immediately initiate the recruitment and training process for Support Brokers and Consumer Care staff. All staff will be trained on ACES$ policies, procedures, and training requirements. This includes education on Self-direction principles, working with older adults, adults and children with intellectual, developmental and physical disabilities, as well as their family members. Our internal training resources include our Director of Training and Consumer Care, Emily Miller, along with Program Directors in Illinois, Colorado, Wyoming, and Georgia, and ACES$ staff in Scranton, Pennsylvania.

We will work with the state to determine the most effective location for our staff. We anticipate opening an office in the Burlington area. We will work with the state staff to identify the best locations based on Participant distribution and refine as necessary. Our Support Brokers will perform personalized enrollments, background checks, program, employer and online system training out of our Burlington office. We will manage Consumer Care through our Burlington satellite office as well. ACES$ established satellite locations in Colorado, Wyoming, and Georgia in a matter of weeks, well before the required "Go-Live" date, to assist with transition and implementation duties. Our Scranton Team is ready to support the transition phase efforts. During the recruitment phase, should interim staffing in the Burlington office be necessary, we have experienced ACES$ team members from our offices throughout the country available to provide assistance. Our Vermont offices would utilize the same business hours as our other offices, which are 8:00am to 5:00pm. Additionally, our physical presence is important for any potential travel-by Individuals, community collaborators, and vendors. Our Scranton headquarters is a fully accessible location with local transit/bus access. Our satellite offices will also be fully accessible, ideally with local transit access.

Task 14 - Operational Readiness Review

As noted in our Work Plan, we intend to have all tasks and deliverables within our Start-up Plan Goal I complete by **January 19, 2017**. We will conduct an in-house review, using our internal readiness assessment matrix, to ensure we meet all requirements, as well as an external Readiness Review performed by the state if required. Therefore, we plan to have essential startup tasks complete by **January 19,** to ensure time for a complete readiness review enabling a go-live date of **February 1, 2018**.

START UP PERIOD - Goal II: Establish a Collaborative Presence

To accomplish this goal, we address the need to communicate and coordinate with the key entities involved the programs. We recognize that staff assigned to this project must be able to work cooperatively with the state and other entities such as Case Management agencies, and union during all phases of the project.

Goal II has two main tasks:

Task 1- Collaborate with Lead Agencies and Other Entities

During the kick-off meeting, ACES$ will work with the state to identify key stakeholders and organizations in order to establish a Program and Statewide presence. We will build these references into our Communication Plan, which we tailor to each contract, and will modify our FMS Communication Policy as needed. We anticipate opening offices in Burlington, Rutland, and the Brattleboro area. These seem to be central locations for State staff and/or have access to large program populations. Our Vermont FMS Program Director will serve as the FMS liaison overseeing both Consumer Care Specialists and the Support Brokers, as well as orientations and trainings with the state, regional Case Management and administrative entities, and other community entities, as appropriate. We will reach out to Case Management entities to conduct in-person orientations with staff that work with, or refer to, the self-directed waiver programs. We do this within early stages of contract award and throughout the contract.

This outreach will be particularly important as we transition and during the early months of service implementation. Key partnerships and relationships will assist in acclimating Participants, Case Managers and Employees to the changes in FMS provision.

By having a strong Vermont presence, our Support Brokers have the capability to conduct face-to-face meetings and trainings easily with individuals, families, and representatives. We feel this emphasizes the Person-centered philosophy and helps reinforce Self-direction. There is a definite difference between providing training over the phone, or simply asking people to download and complete forms, versus sitting down with the Individual, walking them through what needs to be completed, and explaining why. The Individuals and their families feel a personal connection and less overwhelmed by the daunting process of completing unfamiliar forms. Should an individual feel confused or feel additional in-person training would be helpful, we will provide that personalized support. In-person enrollments are a distinguishing characteristic of **the high level of customer service that ACES$ has always provided**, **whether or not it is required**. This in turn, helps to reduce the burden on everyone by limiting the amount of information needed by Participants, their representatives or family, and their workers. **We are relationship-oriented, not transaction driven. We consider this part of our mission, direction, and ultimately, our success.**

We intend to work closely with Case Management Agencies, and other relevant organizations, at both the local and State levels, during the initial implementation, as well as the ongoing process of managing payroll functions. We will serve as a training entity on relevant contract FMS functions and a valuable resource on self-direction and budget management. As part of this process, it will be important to establish ACES$'s role as the FMS provider and a self-direction resource throughout the service area. We will arrange a call-in telephone conference during the start-up period to introduce our organization, answer questions for local stakeholders, and provide a basic orientation of our forms and tools. Should it be appropriate, we are glad to participate in any formal or informal stakeholder meetings and work groups such as union meetings and EVV stakeholder groups.

We recognize that developing partnerships with the Case Management agencies and others within each region will be critical to the success of self-direction and FMS provision.

ACES$ will follow the state's lead with respect to scheduling and holding any meetings, and we will certainly be willing participants in ad hoc meetings as appropriate. We will clarify with the state, whether informal meetings, such as telephone conferences or requests for information, will need approval. All relevant meeting discourse and outcomes are documented and submitted for State review.

Task 2- Participant Advocacy Group

ACES$ will work with the state program managers to identify Participants that should be a part of the Participant Advocacy Group. The group shall ideally contain:

- Six (6) Participants currently receiving Self-Directed services, with at least one (1) Participant from each program;

- Three (3) family members of Participants currently receiving Self-Directed services;
- Two (2) Employees currently providing services Self-Directed Services; and
- Two (2) Participant advocates not belonging to any preceding group and in no way affiliated with the ACES$.

The Participant Advocacy group will meet quarterly with the purpose of providing ACES$ with feedback on operations. We will also use them as a focus group to gain input on any new functionality proposed.

We will provide the state with reports on Participant Advocacy Group meetings as noted in earlier.

START UP PERIOD - Goal III: Transition Existing Participants

Task 1- Transition Plan

Key Staff: Vermont Program Director, Craig Morrison, Kristy Michael, Kelly Brown

- **Subtask 1:** Submit draft plan upon contract award
- **Subtask 2:** Review of Transition Plan by the state
- **Subtask 3:** Modification based on feedback from the state and re-submission

Task 2 - Data Transfer

Key Staff: Vermont Program Director, Craig Morrison, Duane Seidel, Diane Alberigi, Peter Anania, Michael Mellody, Helen Logan

- **Subtask 1:** FMS vendor meeting between ACES$ and current payment processing staff/vendors, facilitated by the state, to review proposed timelines for data transfer, roles and draft data transfer template
- **Subtask 2:** Revisions made to data transfer templates and mechanisms as needed
- **Subtask 3:** Data transferred to ACES$
- **Subtask 4:** ACES$ internal review of data for regulation compliance, completeness and accuracy

Task 3- Notification of Participants/Employers and Data Validation

Key Staff: State Staff, Vermont Program Director, Support Brokers, Craig Morrison, Kristy Michael, Kelly Brown

- **Subtask 1:** Letter advising of transition and introduction to ACES$ distributed by the state to wavier participants
- **Subtask 2:** ACES$ will develop a follow-up introduction letter with a basic timeline and contact information, should Participants have immediate questions, and a request to call in to verify demographic information on file is correct. This letter is provided to the state for approval and translation (if appropriate) prior to distribution.
- **Subtask 3:** Participants will call Customer Service to verify key personal demographic information, or submit it via our secure online portal. After one week, ACES$ staff will

perform follow-up calls to all Participants that have not contacted us. We use this data to validate transferred data to ensure correct addresses and other pertinent information. (see Task 4)

Task 4- Validation of Participant Data and Upload into System

- **Subtask 1:** Review and update Participant data based on new information received from Participants
- **Subtask 2:** Upload verified data into PAID

Task 5 - Transfer Enrollment Packets, Paperwork Instruction, and Self-direction Program Guidance and Tools

Key Staff: Vermont Program Director, Craig Morrison, Duane Seidel, Diane Alberigi, Kelly Brown, Kristy Michael, Support Brokers, Consumer Care staff TBD

(***Anticipated completion date January 19, to ensure Participant paperwork is in order prior to the February 1 operational start date. We will review Transition dates with the state to determine what timeline adjustments are needed. We have performed complete transitions within a matter of weeks. We are flexible with our timeline dates in order to ensure complete readiness and ease of transfer for the Participants.***)

- **Subtask 1:** Finalize Enrollment Packets: **Please note this task coincides with Start-Up Goal I,** ***Task 11- Update Enrollment, Employer/Employee and Vendor Packet***
- **Subtask 2:** Print and mail partially filled packets to all Participants/Employers. Participants/Employers will receive both the Participant/Employer packets and their Employee Packets. All packets will include instructions as well as methods to receive assistance, along with Consumer Care phone number and all relevant website addresses that contain reference information.
- **Subtask 3:** Upload electronic versions of packets to ACES$ online Documents Center, for Participants and Employees who wish to complete and submit packets online.
- **Subtask 4:** Consumer Care packet assistance and instruction available to Participants by phone.
- **Subtask 5:** Budget Tools and Online Training Modules – Update online training modules, how to complete enrollment paperwork and key points on Self-direction, to reflect Vermont requirements and upload to ACES$ website. (See narrative below for additional information.)
- **Subtask 6:** Go-to-Meeting Webinars – We will host up to three (3) webinars shortly after mailing paper packets to Participants.
- **Subtask 7:** Instruction / Meet and Greet / In-person Meetings - We will work with the state to provide input on locations and timing based on Participant population. We often work with County ADRCs and CILs to identify the best locations. Often these sites have accessible space we can rent, which is familiar to the population we are serving. Additionally, it provides us with an opportunity to meet with Case Management to introduce processes, our systems and ourselves. Support Brokers will be on hand to meet

Participants and Case Managers and provide assistance as needed. Currently we propose the following site visit structure:

- **Northern Region:** We are proposing two (2) in-person meetings, one (1) in the Burlington vicinity, one (1) in a to-be-determined location based on state feedback. We will discuss with the Program Managers where the highest concentration of participants are in this region to determine accessible locations for meetings.
- **Middle Region** Two (2) in-person meetings, one in Rutland and the other in a to-be-determined location based on state feedback. We will discuss with the Program Managers where the highest concentration of participants are in this region to determine accessible locations for meetings.
- **Southern Region:** Two (2) in-person meetings. We are currently planning one (1) session in the Brattleboro area and one (1) in a to-be-determined location based on state feedback. We will discuss with the Program Managers where the highest concentration of participants are in this region to determine accessible locations for meetings.

It is important to note that all cities noted above are tentative and will be refined/updated based on feedback from the Program Managers upon contract award.

- **Subtask 8:** Completed packets returned to ACES$. Reviewed for accuracy and loaded into our system. (***Anticipated transition completion date January 19, 2018.)***

Task 6- Test data transitions and validations

Key Staff: Vermont Program Director, Craig Morrison, Duane Seidel, Diane Alberigi, Peter Anania

While ACES$ will test systems internally throughout the transition process, this particular task includes working with the state Program Managers. Together, we will ensure fluid data flow between all Vermont systems with our own, and that data validations function per requirements. For this testing, we use Participant data in our Test site. Once tests are complete, data is migrated to the Production/Live site.

Operational Start

ACES$ ensures accuracy and timeliness of FMS duties with a multifaceted approach.

1. Online and internal automated systems have controls and thresholds built-in to safeguard accuracy of payroll, reimbursements of invoices, and billing.
2. Quality Assurance processes are in place to track and verify compliance with federal, state and program requirements.
3. Policies and procedures are in place and updated for each contract we serve.
4. Staff are highly skilled and well trained subject matter experts.

We have addressed many of the technical requirements that appear in the RFP Section 2 within this section. Generally, we address tasks as they occur and do not follow the flow of the requirements as written in the RFP. Please note we provide additional details and functionality regarding our online and internal automated systems in the **Technical Capabilities** section of our response.

OPERATIONAL START, Goal I: Operate as a FMS Entity According to Federal, State and Local Regulations

This is the most comprehensive goal of the Work Plan as it pertains to the entire ongoing FMS operations. General tasks meet our operational flow and include detailed explanations, which address RFP requirements.

For each of the tasks listed below, ACES$ has detailed policies, procedures and internal controls.

As noted earlier, ACES$ is registered to do business in Vermont.

Task 1 - Receive and Maintain Federal and State Authority to Act as an FMS

Meeting RFP Requirement Section 2, A. Qualifying as the Fiscal Agent

As a Fiscal Intermediary, ACES$ applied for and received a separate Fiscal/Employer Agent Federal Employer Identification number (FEIN) under section 3504 of the Internal Revenue Service in 1995 and maintains that number currently. Northeast Pennsylvania Center for Independent Living d/b/a ACES$, has a separate FEIN number, 23-2661165, and is registered with the IRS under section 3504, solely for Fiscal/Employer Agent tasks and responsibilities. We are an approved vendor in Vermont.

Task 2 - Assign Support Broker and Perform Related Supports Broker/Enrollment Tasks

***Meeting RFP Requirements Section 2, R.* Employer and Employee Enrollment**:

Support Brokers will:

- meet all Participant communication and training requirements;
- assist with Participant and Employee enrollment packets;
- verify that Employees meet specified qualifications and complete training requirements;
- perform background checks;
- address questions and concerns regarding Self-direction;
- process referrals for Self-direction and initiate services;
- train on Employer and Employee responsibilities; and
- Train on online portal and timesheet submission.

Task 3 - Provide Customer Service

Meeting RFP Requirements for Section 2, O. Providing Information and T. Training and Communication

ACES$ has an established customer service approach using the combination of automated call prompt system (through which live Client Care Specialists assist individuals), TTY, Short Message Service (SMS) and email. This combination effectively and efficiently serves Participants, their

Surrogates, Case Managers, Employees, and vendors. Enrollment Agents and Support Brokers work with Participants to review all materials and provide training on our online system. We are able to arrange for translators and/or translated materials, as needed. Our grievance policy is provided at the time of enrollment as well as customer service and enrollment contact information. Satisfaction surveys are issued to Individuals, Employees and Case Managers to see how we can improve their experience and our performance. Our customer service policies and procedures reflect the principles of Self-direction. They were written, and are implemented, to be culturally sensitive and practical in order to communicate effectively with a diverse Participant population spanning all ages and with a variety of chronic conditions. We ensure that Individuals are able to access information, training programs, and supports related to our FMS operations. We track all contacts within our PRM system.

Task 4 - Coordinate and Communicate with Lead Agencies and Administrative Entities and Meet with Participant Advocacy Group (PAG)

As part of our routine business practices, ACES$ works with stakeholder agencies to develop an agreed upon approach for managing information and trainings for FMS activities. We also meet quarterly with our Participant Advocacy Group. This task is in conjunction with ***Start-up Goal II.***

Task 5 - Support Broker Activities and Provide Common Law Employer/Employee Orientation and Skills Training

Meeting RFP Section 2, A. Working with Employers and Employees, O. Providing Information, and T. Training and Communication

Participants and their Representatives (when applicable) will receive orientation within two (2) business days by their assigned Support Broker. ACES$ ensures that it educates Individuals in FMS activities in an accurate, thorough manner. We prepare and present all informational and training materials to the Individuals according to IRS and State (if available) FMS standards. All materials are translated as need. The Training portion of our response within the **Technical Capabilities** section provides detailed information on training materials and methods used of ongoing orientation and skills training.

We are able to provide online and in-person training for Participants. We will discuss with the Program Managers if there are any particular issues or compliance concerns and include training areas to address these. Training Module Topics include the following:

- Participant Direction 101
- Roles and Responsibilities within the Program
- Contact Information and Helpful Tools
- Employee Paperwork
- Timesheet Submission, Online System Orientation, and EVV
- Workplace Safety
- Fraud, Abuse and Neglect
- Filing a Grievance

ACES$ tracks completion of all training modules in the Employer and Employee file within PAID. Once completed successfully, we record the date and completion status and issue a certificate of completion. Employers and Employees are not given a "good to go" until these trainings are completed should that meet program requirements. Once they are completed and all requirements are met successfully, including paperwork and background check completion, they become active in PAID and are able to submit timesheets.

Task 6 - Enroll Participants and Surrogates with the FMS organization as the Common Law Employer, along with Employees

Meeting RFP requirements Section 2, B: Authorizations and Program Limitations, and F. Unique Identifier, and R. Employer and Employee Enrollment, T. Training and Communication

We provide all essential federal and state forms, as well as agreements and required forms, in our Employer and Employee Packets. We will make any necessary revisions to forms, based on program requirements and reading level, during our startup period. At this time, we will also customize forms to reflect Program or State terminology.

The Individual must complete the Enrollment Packet prior to receiving FMS. In advance, the Support Broker pre-populates forms with basic information to ease the enrollment process, much the same way a Case Manager would. We provide additional detail on our enrollment process and forms within the Enrollment section of our response.

ACES$ will adhere to the State's processes requiring prior written/electronic authorization before the initiating services with an Employer (Participant/Surrogate). We will follow the individual program rules and limitations for each of the various programs.

We understand that individual programs have varying requirements for the following and will integrate these variations into our operating systems, policies and procedures:

- Service Allocations and Plans of Care vary across programs
- Hourly rates may vary and are determined by the employer within the limits established by State and Federal law, State policy and the Collective Bargaining Agreement (CBA).
    - We require documentation during the enrollment process of the Employee Rate and verify that the rate meets the requirements set forth prior to activating the Employee.
- Number of hours billed in per calendar day: We understand that for the majority of the programs this cannot exceed 24 hours between multiple providers/employees, except in DDS as authorized by the Individualized Service Agreement (ISA). For employees, the number of hours billed in one calendar day cannot exceed 24 hours between multiple participants/employers, except in DDS.
- Adhering to CBA established rate: We understand that providers employed through programs covered by the CBA between the State of Vermont and AFSCME shall be paid no less than the minimum rate established in that agreement. The wage paid to providers not covered by the terms of the CBA shall be paid no less than the Vermont minimum wage.

ACES$ maintains an Employer Identification Number (EIN) for each individual employer for the purposes of tax reporting and as a unique identifier in the secure system, along with an ACES$ assigned Participant/Employer ID.

Task 7 - Perform Background Checks

Meeting RFP Requirement Section J: Background Checks

As part of requirements, before beginning work, each employee must have a criminal background check completed. Therefore, as part of the employee packet procedure, an ACES$ staff person will run all required background checks. Additionally, an ACES$ Support Broker will verify all certifications are complete and in compliance, and determine any issues that may affect the credentialing of an employee to perform assigned duties. This is complete prior to entering the employee information into our PAID payroll processing system. Background checks are tracked and maintained in our note system.

Background checks are performed for all participant employees as per DAIL's Background Check Policy. Staff will check all potential employees against the exclusionary lists as required by the State and the Federal Governments.

ACES$ will:

- Check the employee against the Department of Human Services Office of Inspector General's Exclusionary list.
- On a schedule and in a format agreed upon by the State and the vendor, supply the State with a list of all employees currently active in its system. The State shall check these employees against such exclusionary lists as required by state and federal law and regulation. If any employee is found to be on any of these lists, the state shall inform the vendor of that finding.
- Upon being informed of the presence of an employee on any exclusionary list, confirm that the name on the list is, in fact, the employee receiving payment via their services.
- Upon learning that an employee is ineligible for payment, as a result of an exclusionary finding on any background check, inform the employer of the findings and cease payment as of the date of the vendor's learning of the finding. Services cannot be provided until background checks are complete and the employee has met all background check requirements.
- Not process payroll for services provided for any employee who has not successfully met all required background checks or has not been granted a "variance" to work by the State.
- In the case of DDS and Integrating Family Services-Respite and the Ombudsman Program, send verification to the appropriate Designated Agency/Specialized Services Agency/Supportive Intermediary Service Organization (currently Transition II) that a background check has been performed on all workers paid through the ACES$. ACES$ will run a background check, when requested by an independent employer, on individuals who are hired by independent employers managing Developmental Services supports, but who may not use the vendor for payroll functions.

Task 8 - Enroll Vendors

Meeting RFP requirements

ACES$ has written policies and procedures related to the completion of enrollment for the Participant's Vendors that follow the requirements set forth by Colorado, Illinois, Wyoming, Georgia, Maryland and Washington FMS standards. Currently, it is the responsibility of the Support Broker and the Participant to ensure that all forms pertaining to Vendors are complete, accurate and compliant with Program requirements. The Support Broker reviews all documentation thoroughly to ensure paperwork is completed accurately the first time, before it is entered into the system. By obtaining vendor information in advance whenever possible, we ensure Participants that purchase goods and services from vendors are able to ensure quick reimbursement for items. We provide additional detail on our Goods and Service process within the Goods and Service section of our response.

Task 9- Accepting and Processing Timesheets

Meeting RFP Requirements Section 2, K Accepting Timesheets, and L. Processing Timesheets

ACES$ is able to accept timesheets in a variety of methods to include mail, fax, email and through our online portal. Additionally, timesheets may be submitted to our online portal through our mobile application, ACES$ Mobile™, which also serves as our EVV system. Our timesheets have a dual signature authorization requirement, which means that the Employer/Participant must sign off on all hours submitted by an employee, in addition to the employee signature. See ***Figure 45*** for an example of our Georgia Paper Timesheet. Our Vermont Paper Timesheet will reflect Vermont program requirements and will be submitted for review and approval as part of our start-up phase. Our online system has role-based security so that the Employer and employee have different sign-in/passwords to authorize hours submitted. In all methods of timesheet submission, the signee must check-off the attestation of truth (***Figure 46***), certifying that the timesheet is an accurate representation of the hours worked. When we provide orientation to Participants and Case Management entities, we stress the importance of timesheet accuracy, what constitutes fraud, and the need for immediate notification when a hospitalization occurs. When we do receive notice, we flag the account in our PAID system. As a result, regardless of the method of timesheet submission, payroll will be kicked-out and a timesheet is not processed. Their online timesheets are blocked from submission entirely.

Figure 45: Georgia Paper Timesheet

aces$ FINANCIAL MANAGEMENT SERVICES

ACES$ Financial Management Services Georgia
Email Timesheets to: timesheetsGA@mycil.org
Fax Timesheets to: 877-525-9287

Participant Name: ______________ Attendant Name: ______________

Participant ID: ☐☐☐☐ Attendant Last 5 Digits of Social Security Number: ☐☐☐☐☐

Pay Period: ◯ 1st (1-15th) ◯ 2nd (16-31st) Month: ☐☐ Year: 20☐☐

When Faxing Timesheets, Please Do Not Include a Coversheet.

Day of Month	Check-In HH:MM		Check-Out HH:MM		Total Hours HH.HH	Service Code
	:	AM / PM	:	AM / PM	.	
	:	AM / PM	:	AM / PM	.	
	:	AM / PM	:	AM / PM	.	
	:	AM / PM	:	AM / PM	.	
	:	AM / PM	:	AM / PM	.	
	:	AM / PM	:	AM / PM	.	
	:	AM / PM	:	AM / PM	.	
	:	AM / PM	:	AM / PM	.	
	:	AM / PM	:	AM / PM	.	
	:	AM / PM	:	AM / PM	.	
	:	AM / PM	:	AM / PM	.	
	:	AM / PM	:	AM / PM	.	
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	:	AM / PM	:	AM / PM	.	
	:	AM / PM	:	AM / PM	.	
	:	AM / PM	:	AM / PM	.	

Service Code Guide

COMP & NOW Waivers

BSC	Behavioral Supports Consultation
BSS	Behavioral Support Svcs
CAG	Community Access Group
CAI	Community Access Individual
CGS	Community Guide Svcs
CLD	Community Living Support - Daily
CLH	Community Living Support - Hourly
LPN	Nursing LPN
NRN	Nursing RN
NST	Natural Support Training Svcs
RSH	Respite Svcs - Hourly
RSO	Respite Svcs - Overnight
SEG	Supported Emp Svcs - Group
SEI	Supported Emp Svcs - Individual

CCSP Waiver

PSS	Personal Support Svcs

ICWP Waiver

PSA	Personal Support Svcs - Level 1
PSB	Personal Support Svcs - Level 2
PSC	Personal Support Svcs - Level 3

Need Help? Call Us!
Toll-Free 844-500-3814

Total Hours ☐☐☐.☐☐

Employer Signature *Date* *Attendant Signature* *Date*

2051700

I certify and affirm that this timesheet is an accurate representation of services rendered by the named employee to the named supervisor. Misrepresentation or false statements may result in administrative penalties, criminal prosecution and/or termination from the program.

Figure 46: Attestation of Truth

I certify and affirm that this timesheet is an accurate representation of services rendered by the named employee to the named supervisor. Misrepresentation or false statements may result in administrative penalties, criminal prosecution and/or termination from the program.

As noted earlier in the Technical Capabilities section (*Online System*), the PAID/NOTE system automatically validates all submitted timesheets to ensure the number of hours, service types etc. meet Participant authorized limits, plans of care, and program requirements. ACES$ contacts the Employer immediately if corrections are needed or errors are detected. Our system detects instances of overlapping hours, and kicks-out timesheets for review if multiple Employees submit the same hours of service for the same Employer. We are able to monitor for frequent errors, and address them as training issues and/or flag as potential fraud. Case Managers or Program Managers may be contacted in those instances based on individual program processes and requirements.

Task 10 - Process and Distribute Qualified Employee Payroll, Related Taxes and Insurances

Meeting RFP requirements Section 2, M. Payment to Employees, H. Withholding and Judgments, I. Garnishments, and E. Payroll Reports

PAID is a robust system that works in conjunction with NOTE. It reviews and "kicks-out" timesheets, or reimbursement requests, due to program business rules prohibiting over-budget or insufficient funds in real-time. As mentioned, NOTE and PAID are customizable to all Vermont program rules and regulations. All timesheets and reimbursement requests process through PAID, regardless of submission method. This means if a Participant has multiple Employees, and one Employee prefers to fax their timesheets while the other submits them online, the Participant will be able to see all timesheet submissions and budget history, regardless of the timesheet submission method. (This is also true when a Case Manager logs on to our NOTE system to review their caseload.)

ACES$ issues payroll to Employees via direct deposit, check or Paycard, as preferred by the employee. We often recommend direct deposit due to the timeliness rather than Employees waiting on the unpredictability of mail delivery. Our Consumer Care Specialists and Payroll department are available to Employers and Employees should questions arise regarding payroll matters. ACES$ operates a semi-monthly payroll cycle. ACES$ payroll staff will process all fully completed timesheets that are in the office by *the 4th at midnight and the 19th at midnight,* in compliance with Federal and State Departments of Labor (DOL) regulations. The deadline for a compliant timesheet's inclusion in a regularly scheduled semi-monthly payroll is close of business the day prior to the payroll's pay date. This allows ACES$ time to run final payroll reports and submit federal tax deposits in accordance with IRS Publication 15 (Circular E). Timesheets received within the prescribed submission timeline sometimes cannot be included because they require correction(s) from their original form. ACES$ contacts the Employer/Employee to correct timesheets immediately via phone/email. Once a corrected timesheet is obtained, it is processed within our supplemental payroll. ACES$ provides a **supplemental payroll** for those Individuals unable to get their timesheets in on time, or who may have had to make corrections. **ACES$ processes payroll checks weekly.** Should an employee not receive a check we have a process in place to cancel the check and replace it. We understand timeliness is often critical for employees when it comes to payroll. ACES$ has in place a policy and procedure for un-cashed checks. For each state we work in, we update this procedure to reflect requirements and procedures established by the State Treasurer.

Once an Employer is no longer participating in the program ACES$ deactivates them in PAID. This means that Employees are not able to submit timesheets for an employer no longer in the program. Our system will automatically reject the timesheet. If an Employee is fired, quits or appears on an exclusion list during time of employment and is no longer able to serve as a worker ACES$ is able to deactivate the Employee in the same way.

Should an Employer wish to update an Employee Wage Rate we provide an Employee Rate Sheet. We update this form for every program to reflect service codes and rate requirements within that program. Once the updated rate sheet is completed and signed, ACES$ staff process the rate change and update the PAID system including the date the rate change took place. In our system, we are easily able to manage an Employees various pay rates, should an employee work for multiple Employers within the same or across multiple programs. Additionally we are able to process payroll for multiple services with varying pay rates for one time period should a Program/Employer have that need.

ACES$ will update processes to coincide with the terms established within the CBA. Our policies and procedures reflect requirements established by the Department of Labor's Home Care rule. PAID and note are able to track sick and leave time based on program requirements.

ACES$ works within the IRS guidance to determine if an individual is an employee or independent contractor. We process the Employer's share of all taxes due, including state and federal income tax, FICA, and unemployment compensation taxes are withheld, filed, paid on time and in full for each participating employee. ACES$ makes advance payments of Federal Earned Income Credit to eligible employees.

Additionally, we ensure that all judgments, garnishments, tax levies, and any other related holds on an Employee's wage, are properly administered and processed, as may be required by local, state or federal laws, and/or State policy and procedure.

Task 11: Unemployment and Workers' Compensation

Meeting RFP Requirement Section 2. S. Unemployment and Workers' Compensation

ACES$ follows established procedures to ensure coverage of eligible individuals under the group Workers' Compensation Insurance policy secured by the State. Additionally, ACES$ will:

- Establish a separate account with the VT DOL for each of the employee groups represented by the respective programs;
- File any reports relating to health insurance coverage which are or will become required; and
- Serve as the employer's representative with VT DOL when claims related to FMS are filed, cooperating with the VT DOL in accordance with State procedures.

Task 12: Serve as Billing Agent for Family Directed Hi-Tech Nurses

Meeting RFP Requirement Section 2, C. Billing Agent for Family Directed Hi-Tech Nurses

For the Self/Family Directed HTN program, ACES$ will serve as the billing agent. Tasks performed include:

- Receiving timesheets from the nurse-provider;
- Confirming timesheets meet minimum acceptable criteria established by the State;
- Converting timesheets to a format accepted by the Vermont Medicaid fiscal agent (currently DXC);
- Submitting claims to the Vermont Medicaid billing contractor (currently DXC);
- Monitoring the processing of a claim and informing the nurse-provider if there is a problem with payment of a claim.

We understand that ACES$ will not issue checks based on the timesheet submissions. The nurse-providers function as independent contractors and ACES$, as well as the Participant/Participants' family, will not be considered the Employer. For all nurse-providers we will have a separate enrollment packet that is unique and gathers only pertinent information needed to serve as their billing agent. During the start-up period, we will work with DXC and the state to determine the appropriate forms, timelines and transmission methods. We are able to create a monitoring report to allow both DXC and State Department of Vermont Health Access (DVHA) to monitor claims and ensure accurate payment.

Task 13: Processing Patient Share

Meeting RFP Requirements Section 2, D. Patient Share

ACES$ will track the Patient Share for Choices for Care Participants within PAID/NOTE. We will work with the state to determine the details of the current process used to bill Participants and discuss opportunities for increasing efficiencies and tracking. ACES$ will:

- Bill participating employers any Patient Share payments as determined by DVHA;
- Track the amount of Patient Share withheld by Medicaid in both PAID and NOTE for increased monitoring capabilities;
- Manage and track Patient Share notices from the DVHA in PAID and NOTE; and
- When needed interact with other service providers to ensure the "highest paid provider" determination accurately reflects the collection, withholding, and payment of Patient Share.

Task 14- Tax Related Activities

Meeting RFP requirements Section 2, N. Tax Related Services

While ***Task 11*** covers ongoing payroll and therefore includes tax activities, specific tax activities performed by ACES$ include:

- Updates to common law employer and qualified employee address or phone numbers prior to mailing out tax information in January of each year
- Processing refunds of over-collected FICA for eligible common law employers and qualified employees in accordance with IRS and State directives
- Maintaining documentation related to FICA refunding in each applicable common law employer and qualified employee file
- Processing, filing and distributing IRS Form W-2, *Wage and Tax Statement* for all qualified employees, and in accordance with IRS instructions, for agents. As part of this process, the total gross payroll per the Form W-2 is reconciled to the calendar year's total gross payroll
- Verifying that each qualified employee's social security number matches the name and date of birth information obtained from SSA's *Business Services Online* prior to submitting IRS Form W-2 to SSA each calendar year
- Maintaining copies of the federal copy of Form W-2 and related documentation in each qualified employee's file
- Processing and filing IRS Form W-4 and/or W-5 forms, as appropriate
- Maintaining copies of IRS Form W-4 and/or W-5 forms, as appropriate, in the FMS organization's file
- Processing any returned, qualified employee payroll checks, vendor or small unlicensed provider payments, in accordance with Unclaimed Property Laws;
- Maintaining copies of Unclaimed Property-related documentation in the qualified employee, vendor or small unlicensed provider's file;
- Completion of IRS 941 deposits;
- Payment of workers' compensation insurance policy premiums;
- Payment of any other employment-related federal and state taxes;
- Preparation and mailing of IRS 1099 forms for independent vendors;
- Payment of actual unemployment claim costs, as forwarded to the vendor by the Vermont Department of Labor (VT DOL) files by program;
- Participation in the annual Worker's Compensation Audit with the current policy carrier; and
- Refund to employees and to the State any FICA payments withheld for those employees for whom FICA withholding is not required.

We will revise this process as needed to reflect any specific Vermont filings, withholdings, or program related processes.

Task 15- Process and Track Payments for Approved Individual-Directed Goods and Services

Meeting RFP requirements Section 2, M. Payment to Employees, (7)

ACES$ has abundant experience processing Goods and Services through our own systems. ACES$'s Accounting and Payroll departments receive, verify, process, and pay all reimbursement requests and invoices through the PAID system for payments made to Individuals or vendors in accordance with the Individual's authorized plan, as well as program and state requirements.

We process goods and services similar to timesheets. The goods and service submissions must be authorized and within budget prior to payment. We can issue payment directly to vendors, or reimburse Participants. We are able to set up direct deposit options for payment or check. Our process is flexible is easily able to meet requirements of the program. During start-up, we will work with the Program Managers to determine specific requirements for goods and service processing.

Task 16- Establish and Maintain Employer/Employee Packets, Corresponding Files and Documentation

ACES$ maintains individual file documents electronically or, in some cases, hard copy, for each Individual and employee it serves. We ensure that all Individual documents are legible, current, and accurate. This includes verification that documentation meets program requirements. Any permanent hard copy files are kept in a secure filing cabinet in the FMS department, along with other sensitive ACES$ documents in accordance with HIPAA standards.

ACES$ establishes and maintains employer/employee packets, corresponding files and documentation for all those we serve. We maintain individual file documents electronically or, in some cases, in hard copy, for each Individual and employee it serves. We ensure that all documents are legible, current, and accurate. This includes verification that documentation meets program requirements. Any permanent hard copy files are kept in a secure filing cabinet in the FMS department, along with other sensitive ACES$ documents in accordance with HIPAA standards. There is restricted access for electronically stored documents, as noted above.

ACES$ abides by federal and state-specific regulations and requirements concerning confidentiality of Protected Health Information (PHI) and Health Insurance Portability and Accountability Act (HIPAA). We maintain all archived files in a secure and confidential location for a total of seven (7) years, or as per regulation. We are responsible for proper disposal of both hard and electronic working copies of information during this project, as well as any remaining information upon the completion of the project. ACES$ utilizes the services of a third-party document shredding company for the disposal of confidential documents, as appropriate.

We are current on all US Citizenship and Immigration rules and ensure that our system and packets accurately obtain and track all required information by maintaining the most current IRS forms. This information is also accessible via our website. We verify employees' citizenship/legal alien status by verifying social security numbers with the Social Security Administration and completing the Bureau of Citizenship and Immigration Services (BCIS) Form 1-9. Additionally, we employ three (3) E-Verify Certified Staff members. U.S. law requires companies to employ only individuals who may legally work in the United States – either U.S. citizens, or foreign citizens who have the necessary authorization. This diverse workforce contributes greatly to the vibrancy and strength of our economy, but that same strength also attracts unauthorized employment. ACES$ uses the E-Verify system from U.S. Department of Homeland Security to determine if an individual is legally allowed to work. The E-Verify is an Internet-based system that compares information from an employee's Form I-9, Employment Eligibility Verification, to data from U.S. Department of Homeland Security and Social Security Administration records to confirm employment eligibility. The Employee Packet, provided during the enrollment process, includes the I-9 Form. We maintain all related documentation in the employee files.

Task 17 - Bill for Services Rendered

Meeting RFP Requirements Section 2, P. Claims and Reimbursement

ACES$ has a systematic process in place to bill for services rendered. The process includes utilization of our PAID system, a proprietary record management system, which ensures timely and accurate payment for Participant services. PAID is also responsible for the billing and reconciliation of claims, to and from state agencies, for Participant services. ACES$ is reimbursed for its services by billing for Participants served on a monthly basis. PAID creates and generates invoices, following the file specifications provided.

ACES$ will submit an administrative invoice monthly or as per prescribed requirements, which includes the number of current Participants and new Participants; number of current Employees and new Employees; names, Participant ID, and Employee Provider Number for each Participant and Employee. We will only submit claims to the state, as applicable, and pay Employees for those services authorized and satisfactorily performed by Employees. We will work within the state’s required format/process and include Medicaid provider ID numbers on all submitted claims.

ACES$ has a detailed process and workflow developed to address how we interact with state agency systems for authorizations and claim submissions within our policies and procedures. We are able to modify the process, in any way, to meet Vermont’s current or desired process. We plan to discuss options with the Program Managers and Billing staff upon contract award to determine the most mutually efficient process. All internal processes and systems used will meet requirements outlined in the RFP. We are also provide respective Program Managers with a monthly summary report (see ***Reporting*** section) of all services provided. We will work with respective program billing staff to resolve any issues with submitted invoices in a timely manner that meets specified timeframes.

Task 18 - Manage Public Funds

ACES$ is an IRS-approved Fiscal Intermediary and a Medicaid enrolled provider. Therefore, we are able to provide FMS services for both Medicaid-waiver and non-waiver programs. As noted above, ACES$ has a process in place for receiving and maintaining initial and updated service plans and budgets from support planning and coordination entities.

We have a detailed QA/QI process that includes oversight of all contract requirements and deliverables, such as accuracy and timeliness of FMS duties, reporting and billing. We provide additional detail in the *Evaluation and Performance Measures* section of our response.

Task 19 - Prepare and Submit Required Reports

Meeting RFP Reporting Requirements

ACES$ has a system in place to prepare and submit required reports to the state, Case Managers and Participants, according to federal, state, and program guidelines. (See ***Reporting Requirements*** section for samples and detail) As per Goal I, we revise these reports and formats based upon the Program Managers input after contract award. Our integrated and automated FMS online portal PAID and NOTE are capable of generating reports through the accounting and/or payroll system per individual program requirements. Program Managers, Case Managers, Participants and Employees are able to log in to NOTE and obtain real-time information on current and historical use information.

ACES$ has the following standard reports, however, should a program require a variation on the reports listed below or additional reports, ACES$ has the ability to generate reports on-demand based on program specifications and data elements tracked.

- Monthly Consumer Expenditure Statement (MCES)
- Monthly Enrollment Reports
- Quarterly Aggregate Expenditure Report
- Monthly and Quarterly Attendant/Employee Application Processing Report-
- Quarterly Demographic Report
- Semi-Monthly Account Summary Reports
- Monthly Background Check Reports
- Complaint Reports
- Monthly Customer Service – Call Data Report

Additionally, we will grant access and give view rights to Program Manager to monitor all Participants served through the program. This enables Program staff to query and review, in real-time, budget amounts, payroll dates, employee hours, goods and services purchased, payroll expended in that period for each employee, total payroll amount, and the balance remaining in each monthly allocation to date.

Task 20 - Physical Plant, Equipment, Technology and Development, Implementation and Maintenance of Communications and Information Systems

Meeting RFP Requirements

ACES$ abides by federal and state-specific regulations and requirements concerning confidentiality of Protected Health Information (PHI) and Health Insurance Portability and Accountability Act (HIPAA). We maintain all archived files in a secure and confidential location for a total of seven (7) years. We will be responsible for proper disposal of both hard and electronic working copies of information during this project, as well as any remaining information upon the completion of the project. ACES$ utilizes the services of a third-party document shredding company for the disposal of confidential documents.

Work Space and Equipment

All ACES$ locations are accessible and ADA compliant. ACES$ continually invests in up-to-date and accessible hardware, telecommunications, and network equipment. As part of our management Information Technology strategic plan, we provide continuous security, performance and functional enhancements to all parts of our IT infrastructure. All staff have the necessary equipment and infrastructure support to perform their functions securely and efficiently. All staff have the necessary voice and data hardware and software to perform assigned job functions, including staff working in the field. For staff dedicated to perform FMS functions, we grant access to specific Individual data, as needed, to perform their assigned job function.

Emergency Preparedness and Disaster Recovery Plan

ACES$ has a proprietary Disaster Recovery/Business Continuity Plan. We will refine this plan for Pennsylvania based on feedback from the Program Managers. One of our most important advantages is our twenty-four (24) hour disaster recovery and business continuity capability. Regardless of the circumstances, our staff and facilities can continue to operate through any natural or manmade disaster. We use cutting-edge, cloud technologies that allow us to if necessary operate entirely virtually. Staff from all over the country can work together online to continue operations for any state with full access to all Individual, Employee and employer records, and online users are guaranteed 99.9% uptime.

Task 21 - Processing an Employer's Disenrollment

ACES$ maintains specific policies and procedures for dis-enrolling Employers. We perform the following tasks as part of this procedure.

- Revoke the IRS Form 2678 with the CLE, when appropriate;
- Maintain a copy of the revoked Form 2678 and the IRS revocation confirmation letter (LTR 4228C) in the CLE's archived file;
- Revoke the IRS Form 8821 with the CLE, when appropriate;
- Maintain a copy of the revoked Form 8821in the CLE's archived file;
- Retire the CLE's FEIN, when appropriate;
- Maintain a copy of the documentation of the FEIN retirement in the CLE's archived file;
- Revoke *Power of Attorney* with the Employer, when appropriate;

- Maintain a copy of the revoked *Power of Attorney* in the Employer archived file;
- Retire the Employers Department of Revenue state income tax withholding employer tax account number, when appropriate
- Maintain a copy of the Form Employer archived file;
- Retire the Employer State Department of Labor and Industry state unemployment insurance tax employer tax account number when appropriate;
- Maintain a copy of the form in Employer archived file;
- Compute, withhold and file final state income tax taxes;
- Deposit final state income tax;
- Maintain a copy of the final state income tax filing and deposit and related correspondence in the Employer's archived file;
- Compute, withhold and file final state unemployment taxes;
- Deposit final state unemployment taxes;
- Maintain copies of the documentation of the filing and payment of the Employer's final state income tax and unemployment taxes in the Employer's archived file;
- Terminate the Employer's Employees' compensation insurance policy, when appropriate and submit any premium refund to the Department; and
- Maintain documentation related to terminating the Employer's Workers' Compensation insurance policy in the Employer's archived file.

Task 22 - Maintain Updates to Operational Policies and Procedures

ACES$ maintains an updated version of our Policy and Procedure Manual. As per ***Goal I***, ACES$ will make any necessary modifications to the manual upon contract award prior to operational start and ongoing updates as needed or minimally on an annual basis as per internal procedure.

Task 23: Maintain EVV System and Updates

Meeting RFP and Cures Act Requirements for EVV

Once Go-Live is achieved, January 1, 2019. ACES$ will continue to work with the state, stakeholders and our Participant Advisory Group to identify and implement modifications as needed.

OPERATIONAL START Goal II - Monitoring and Oversight of FMS Activities and Contract

Meeting RFP Requirements Section 2, W. Evaluation and Performance Measures

Goal II consists of four (4) distinct tasks:

Task 1- Implement Quality Assurance Program with Internal Controls

As noted throughout, ACES$ has a comprehensive Quality Assurance process where staff work within a structure of internal controls designed to coordinate various operational tasks and assure Individual satisfaction. Areas needing quality improvement are identified through regular monitoring of the effectiveness of internal controls and establishing a procedure for measuring improvement. The scope of the ACES$ Fiscal Intermediary (FI) Quality Assurance/Quality Improvement (QA/QI) strategy is highly inclusive, starting from the point of initial contact with the Individual to the periodic evaluation of program responsibilities and Individual satisfaction, with the feedback from these evaluations being used to improve services. (See Sample of Wyoming QA/QI Matrix in *Attachment D*). **We will update this process to reflect format variations and process as per RFP example and Requirements.**

Task 2 - Generate Reports on Program Operations and Provide Report Updates

ACES$ will work from updated report templates (accomplished during the start-up period with guidance from Program Managers), which will form the basis for filing these required reports monthly, quarterly, and annually. This is not limited to providing monthly expenditure reports, Enrollment reports and quarterly and annual service usage reports.

Task 3 - Participate in Weekly Department Project Update Meetings

Key ACES$ staff will participate in weekly meetings (or alternate frequency as per state requirement) with Program Managers. The Director of Vermont FMS Operations will participate in-person, while other key remote staff will participate via conference call. We are able to host meetings through online supported conference software to review documents and show project status updates via our tracking software as needed.

Task 4 - Participate in Annual Performance Reviews

ACES$ will participate in an annual FMS organization performance review conducted by the state, should programs require. Regardless of state requirements, ACES$ conducts internal reviews on a regular basis as per the frequencies within our internal QA/QI matrix. The purpose of the performance review is to assess and document our ability to perform as a FMS organization in accordance with federal, state, and local rules and regulations. Should any of the programs wish to conduct this review, ACES$ will be happy to provide full access to information and staff needed. Regardless, ACES$ has an internal monitoring/auditing process, which it will review on a quarterly basis to ensure ongoing compliance.

Closeout Period

CLOSEOUT PERIOD - Goal I - Implement and Execute Closeout /Turnover Plan

We have included a Closeout Period within our Work Plan as a best practice. We understand that the Closeout Period only begins if the contract is not renewed, therefore we do not indicate a date on the Work Plan. We have indicated that the Closeout Period run for 120 days. The Closeout Period consists of the following tasks:

Task 1 - Implement Closeout Plan

ACES$ will implement the most recently updated and approved Closeout Plan upon notification by the state that the contract will not be extended.

Task 2 - Provide transition information to Department and other contractors

ACES$ will provide to Program Managers, or any other contractor at the programs direction, all reports, data, and other information reasonably necessary for transition of services.

Task 3 - Transfer Responsibilities

ACES$ will transfer all responsibilities under the Contract to Program Managers or another contractor, as appropriate, without any significant interruption of services.

Task 4 - Individual, Surrogate and Home Care Employee Notifications

ACES$ will notify all Participants, Surrogates and Employees that it will no longer be the service provider thirty (30) days prior to termination of the contract. ACES$ will create these notifications and deliver them to Program Managers for approval. Once the Program Manager has approved the notifications, ACES$ will deliver these notifications to all Participants.

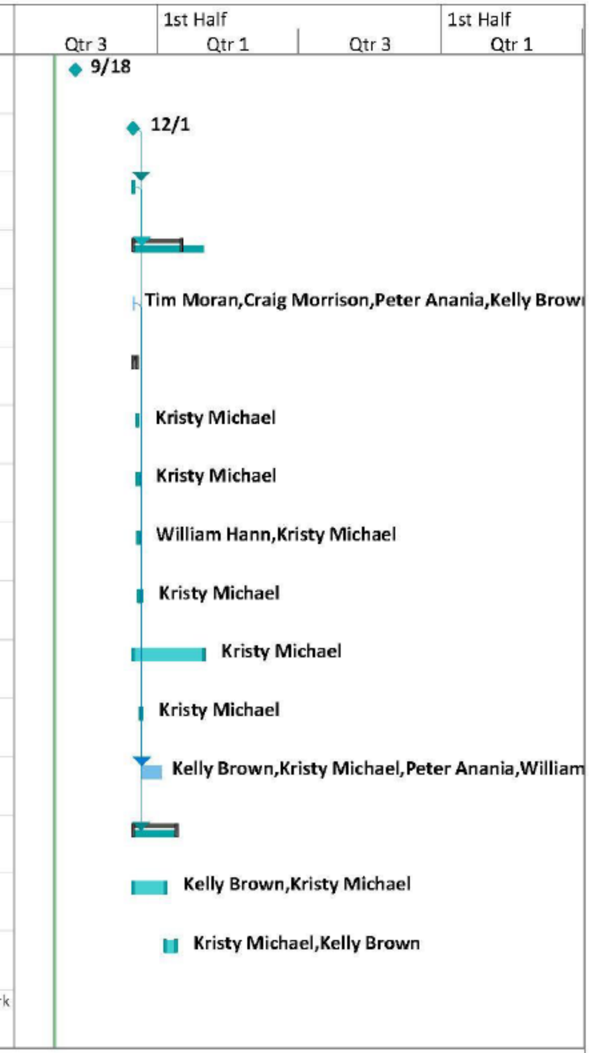
Task 5 - Complete Closeout Plan

ACES$ will complete all steps, deliverables and milestones contained in the most recently updated Closeout Plan approved by the Program Managers.

We have included a Gantt chart below indicated as Figure 46.

Figure 47: Implementation Work Plan Gantt Chart

ID	Task Name	Duration	Start	Finish	Resource Names
1	Award Date	0 days	Mon 9/18/17	Mon 9/18/17	
2	Contract Commencement -	0 days	Fri 12/1/17	Fri 12/1/17	
3	Effective Date	**1 day**	Fri 12/1/17	**Fri 12/1/17**	
4	**START-UP PERIOD - Goal I Complete**	**44 days**	Fri 12/1/17	**Wed 1/31/18**	
5	Task 1 - Project Kick-off	1 day	Fri 12/1/17	Fri 12/1/17	Tim Moran,Craig Morrison,Peter Anania,Kelly Brown,Michael Mellody,William Hann,Diane
6	**Task 2 - Revise and submit Project Work**	**3 days**	Fri 12/1/17	**Tue 12/5/17**	**Kristy Michael**
7	Make Edits required by the	1 day	**Wed 12/6/17**	Wed 12/6/17	Kristy Michael
8	Task 3- Communication Plan	2 days	Wed 12/6/17	Thu 12/7/17	Kristy Michael
9	Task 4 - Business Continuity Plan	1 day	Thu 12/7/17	Thu 12/7/17	William Hann,Kristy Michael
10	Task 5 - Training Plan	2 days	Fri 12/8/17	Mon 12/11/17	Kristy Michael
11	Task 6- EVV Implementation Plan	65 days	Fri 12/1/17	Thu 3/1/18	Kristy Michael
12	Task 7 - Turnover/Closeout	1 day	Mon 12/11/17	Mon 12/11/17	Kristy Michael
13	Task 8 - Update Outreach Materials	20 days	Mon 12/11/17	Fri 1/5/18	Kelly Brown,Kristy Michael,Peter Anania,William Hann
14	Task 9 - Refine Policy and Procedure	40 days	Fri 12/1/17	Thu 1/25/18	Kelly Brown,Kristy Michael
15	Refine and finalize FMS Policies and	30 days	Fri 12/1/17	Thu 1/11/18	Kelly Brown,Kristy Michael
16	Update based on State Feedback	10 days	Thu 1/11/18	Wed 1/24/18	Kristy Michael,Kelly Brown
17	Task 10 - FMS web-based system	34 days	Fri 12/1/17	Wed 1/17/18	Peter Anania,Dave Blaker,Tim Clark



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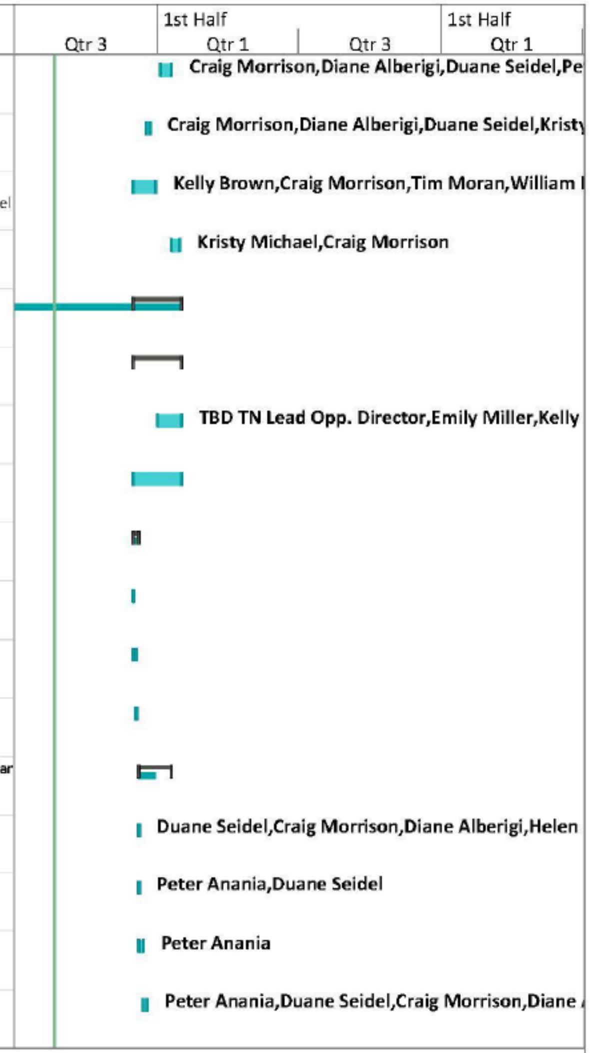
ID	Task Name	Duration	Start	Finish	Resource Names
18	Task 11 - Update and create required	10 days	Fri 1/5/18	Thu 1/18/18	Craig Morrison,Diane Alberigi,Duane Seidel,Peter Anania,William Hann
19	Task 12 - Update enrollment and	5 days	Mon 12/18/17	Fri 12/22/17	Craig Morrison,Diane Alberigi,Duane Seidel,Kristy Michael
20	Task 13 - Satellite office and staffing	21 days	Fri 12/1/17	Fri 12/29/17	Kelly Brown,Craig Morrison,Tim Moran,William Hann,Kristy Michael
21	Task 14 - Completion of the internal	7 days	Fri 1/19/18	Mon 1/29/18	Kristy Michael,Craig Morrison
22	**START-UP PERIOD - Goal II: Establish a**	44 days	Fri 12/1/17	Wed 1/31/18	
23	Task 1 - Collaborate with lead agencies	44 days	Fri 12/1/17	Wed 1/31/18	Kristy Michael,Kelly Brown,Craig Morrison,TBD TN Lead Opp. Director,Michael Mellody,Tim
25	Task 2 - Participant Advocacy Group	23 days	**Mon 1/1/18**	Wed 1/31/18	TBD TN Lead Opp. Director,Emily Miller,Kelly Brown,Kristy Michael,Michael Mellody,Tim
26	**START-UP PERIOD - Goal III: Transition**	44 days	Fri 12/1/17	Wed 1/31/18	
27	**Task 1- Transition Plan Delvierable**	**5 days**	Fri 12/1/17	**Thu 12/7/17**	**Craig Morrison,Kristy Michael,Kelly Brown**
28	Submit Draft Plan	1 day	Fri 12/1/17	Fri 12/1/17	
29	Review of Transition Plan by DDD	**2 days**	Fri 12/1/17	Mon 12/4/17	
30	Modification based on feedback,	2 days	Mon 12/4/17	Tue 12/5/17	
31	**Task 2 – Data Transfer**	**30 days**	Fri 12/8/17	**Thu 1/18/18**	**Diane Alberigi,Duane Seidel,Williar**
32	Meeting between ACESS and current	1 day	Fri 12/8/17	Fri 12/8/17	Duane Seidel,Craig Morrison,Diane
33	Revisions made to data transfer	1 day	Fri 12/8/17	Fri 12/8/17	Peter Anania,Duane Seidel
34	Data transfer to ACES$	4 days	Fri 12/8/17	Wed 12/13/17	Peter Anania
35	ACES$ Data Internal Review	4 days	Wed 12/13/17	Mon 12/18/17	Peter Anania,Duane Seidel,Craig



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ID	Task Name	Duration	Start	Finish	Resource Names	Qtr 3 | 1st Half Qtr 1 | Qtr 3 | 1st Half Qtr 1
36	Upload Participant/Employee	5 days	Mon 12/18/17	Fri 12/22/17	Peter Anania	Peter Anania
37	Data comparison from data received	5 days	Fri 12/22/17	Thu 12/28/17	Peter Anania,Duane Seidel,Craig	Peter Anania,Duane Seidel,Craig Morrison,Diane
38	**Task 3 - Notification of Participants/Employers**	**6 days**	**Mon 12/11/17**	**Mon 12/18/17**	Craig Morrison,Kelly Brown,Kristy Michael	
39	Transition Letter Distributed- DDD	2 days	**Mon 12/11/17**	Tue 12/12/17		
40	Transition Letter Distributed- ACES$	2 days	Tue 12/12/17	Wed 12/13/17		
41	Demographic Data Postcard	4 days	Wed 12/13/17	Mon 12/18/17		
42	**Task 4- Validation of Participant Data and**	**7 days**	**Tue 12/19/17**	**Wed 12/27/17**		
43	Review and update Participant data	**7 days**	**Tue 12/19/17**	**Wed 12/27/17**		
44	Upload verified data into PAID	**7 days**	**Tue 12/19/17**	**Wed 12/27/17**		
45	**Task 5 - Transfer Enrollment Packets and**	**33 days**	Mon 12/18/17	**Wed 1/31/18**	Craig Morrison,Diane Alberigi,Duane Seidel,Kelly Brown,Kristy Michael,TBD	
46	Finalize Enrolmment Packets	3 days	Mon 12/18/17	Wed 12/20/17	Kristy Michael,Kelly Brown	Kristy Michael,Kelly Brown
47	Print and mail partially filled packets	10 days	Wed 12/20/17	Tue 1/2/18	Payroll,TBD Customer Service Agent ,TBD	Payroll,TBD Customer Service Agent ,TBD Suppo
48	Upload Electronic Versions of Packets to	1 day	Wed 12/20/17	Wed 12/20/17	Craig Morrison	Craig Morrison
49	Consumer Care Packet Assistance and	**30 days**	Thu 12/21/17	**Wed 1/31/18**	Payroll,TBD Customer Service Agent ,TBD	Payroll,TBD Customer Service Agent ,TBD Sup
50	Update and Upload Budget Tools and	5 days	Tue 1/2/18	Mon 1/8/18	Kristy Michael,Craig Morrison	Kristy Michael,Craig Morrison
51	Training Webinars	6 days	Fri 12/22/17	Fri 12/29/17	Craig Morrison,Emily Mille	Craig Morrison,Emily Miller,Kelly Brown,Kristy M
52	In-person Instruction/Meet and	3 days	Wed 1/3/18	Fri 1/5/18	Craig Morrison,Emily Miller,Kelly Brown,Kristy	Craig Morrison,Emily Miller,Kelly Brown,Kristy M

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ID	Task Name	Duration	Start	Finish	Resource Names	Qtr 3	1st Half Qtr 1	Qtr 3	1st Half Qtr 1
53	Completed Packets loaded into system	29 days	Fri 12/22/17	Wed 1/31/18	Payroll,Peter Anania		Payroll,Peter Anania		
54	Task 6-Test validation of data in internal systems	22 days	Tue 1/2/18	Wed 1/31/18	Peter Anania,Duane Seidel,Craig		Peter Anania,Duane Seidel,Craig Morrison,Di		
55	**OPERATIONAL START - Goal I: Operate as FMS**	785 days	Mon 1/1/18	Fri 1/1/21					
56	State Approved Vendor	1 day	Mon 1/1/18	Mon 1/1/18	Helen Logan		Helen Logan		
57	Task 1 - Receive and maintain federal and	785 days	Mon 1/1/18	Fri 1/1/21	Helen Logan				
58	Task 2- Assign Supports Brokers and	785 days	Mon 1/1/18	Fri 1/1/21	Craig Morrison,Emily Miller,Kelly Brown,Kristy				
59	Task 3 - Provide customer service	785 days	Mon 1/1/18	Fri 1/1/21	Katlyn Shulde,Laura Pasquini,TBD Customer Service Agent ,TBD Customer Service Supervisor				
60	Task 4 - Coordinate and communicate	785 days	Mon 1/1/18	Fri 1/1/21	TBD Supports Broker				
61	Task 5 - Support Broker Activities and	785 days	Mon 1/1/18	Fri 1/1/21	TBD Supports Broker				
62	Task 6 - Enroll Individuals and	785 days	Mon 1/1/18	Fri 1/1/21	TBD Supports Broker,TBD Customer Service Agent 2,TBD Customer Service Agent 1,TBD TN Lead Opp.				
63	Task 7 - Enroll vendors, small	785 days	Mon 1/1/18	Fri 1/1/21	TBD Supports Broker,TBD Customer Service Agent 2,TBD Customer Service Agent 1,TBD Training and				
64	Task 8 - Process and distribute qualified	785 days	Mon 1/1/18	Fri 1/1/21	Diane Alberigi,Bonnie Royce,Jackie Wilbur,Jonathan Simpson,Kathy Ruane,Katlyn Shulde,Laura				
65	Task 9 - End of year taxes and other	785 days	Mon 1/1/18	Fri 1/1/21	Duane Seidel,Angie Taylor,Marie Baldwin,Melissa Lavelle				
66	Task 10 - Process and track payments for	785 days	Mon 1/1/18	Fri 1/1/21	Diane Alberigi,Duane Seidel,Helen Logan				
67	Task 11 - Establish and maintain files and	785 days	Mon 1/1/18	Fri 1/1/21	Diane Alberigi,Duane Seidel,Helen Logan ,TBD Customer Service Agent ,TBD TN Lead Opp. Director,TBD				
68	Task 12 - Bill for services rendered	785 days	Mon 1/1/18	Fri 1/1/21	Helen Logan ,Kathy Ruane,Eric McDermott,Michael Mellody				
69	Task 13 - Manage public funds	785 days	Mon 1/1/18	Fri 1/1/21	Duane Seidel,Angie Taylor,Melissa Lavelle				

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ID	Task Name	Duration	Start	Finish	Resource Names
70	Task 14 - Prepare and submit required	785 days	Mon 1/1/18	Fri 1/1/21	TBD TN Lead Opp. Director
71	Task 15 - Physical Plant, Equipment,	785 days	Mon 1/1/18	Fri 1/1/21	William Hann
72	Task 16- Processing an Employer's	785 days	Mon 1/1/18	Fri 1/1/21	Duane Seidel,Support Brokers
73	Task 17 - Maintain updates to	785 days	Mon 1/1/18	Fri 1/1/21	Kelly Brown,Kristy Michael
74	Task 18- Maintain EVV System and	524 days	Tue 1/1/19	Fri 1/1/21	Peter Anania
75	**OPERATIONAL START - Goal I: Operate as**	**522 days**	**Thu 2/1/18**	**Fri 1/31/20**	
76	State Approved Vendor	1 day	**Thu 2/1/18**	Thu 2/1/18	Helen Logan
77	Task 1 - Receive and maintain	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Helen Logan
78	Task 2- Assign Supports Brokers	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Support Brokers
79	Task 3 - Provide customer service	**522 days**	**Thu 2/1/18**	Fri 1/31/20	TBD Customer Service Agent 1,TBD Customer
80	Task 4 - Coordinate and communicate	**522 days**	**Thu 2/1/18**	Fri 1/31/20	TBD TN Lead Opp. Director,Craig Morrison
81	Task 5 - Support Broker Activities	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Support Brokers
82	Task 6 - Enroll Individuals and	**522 days**	**Thu 2/1/18**	Fri 1/31/20	TBD Supports Broker,TBD Customer Service Agent
83	Task 7 - Perform Background Checks	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Support Brokers
84	Task 8 - Enroll vendors	**522 days**	**Thu 2/1/18**	Fri 1/31/20	TBD Supports Broker,TBD Customer Service Agent
85	Task 9 - Accept and Process Timesheets	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Payroll
86	Task 10 - Process and distribute	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Diane Alberigi,Marcia Crane,Payroll,Valerie

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ID	Task Name	Duration	Start	Finish	Resource Names
87	Task 11 - Unemployment	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Duane Seidel,Tax
88	Task 12- Serve as billing agent for	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Accounts Rec./Billing
89	Task 13- Processing Patient Share	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Accounts Rec./Billing
90	Task 14- Tax related activities	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Duane Seidel,Tax
91	Task 15 - Process and track payments	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Diane Alberigi,Duane Seidel,Helen Logan
92	Task 16- Establish and Maintain	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Accounts Rec./Billing,Payroll,Suppor
93	Task 17 - Bill for services rendered	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Helen Logan ,Accounts Rec./Billing,Michael
94	Task 18 - Manage public funds	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Duane Seidel,Diane Alberigi,Accounts
95	Task 19- Prepare and submit	**522 days**	**Thu 2/1/18**	Fri 1/31/20	TBD VT Lead Opp. Director
96	Task 20 - Physical Plant, Equipment,	**522 days**	**Thu 2/1/18**	Fri 1/31/20	William Hann
97	Task 21- Processing an Employer's	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Support Brokers,Tax
98	Task 22 - Maintain updates to	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Kelly Brown,Kristy Michael
99	Task 23- Maintain EVV system and	284 days	Tue 1/1/19	Fri 1/31/20	Peter Anania,William Hann
100	**OPERATIONAL START Goal II- Monitoring and**	**522 days**	**Thu 2/1/18**	Fri 1/31/20	
101	Task 1 - Implement quality assurance	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Craig Morrison
102	Task 2 - Generate reports on program	**522 days**	**Thu 2/1/18**	Fri 1/31/20	TBD TN Lead Opp. Director
103	Task 3 - Participate in weekly Department	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Craig Morrison,Diane Alberigi,Duane Seidel,Helen Logan ,Kelly Brown,TBD TN Lead Opp.

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ID	Task Name	Duration	Start	Finish	Resource Names	Qtr 3	1st Half Qtr 1	Qtr 3	1st Half Qtr 1
104	Task 4- Participate in Annual Performance	**522 days**	**Thu 2/1/18**	Fri 1/31/20	Craig Morrison,Diane Alberigi,Duane Seidel,Helen Logan ,Kelly Brown,TBD TN Lead Opp.				
105	**CLOSEOUT PERIOD- Goal I- Implement and**	120 days							
106	Task 1 - Implement updated Closeout				Craig Morrison,TBD TN Lead Opp. Director,Tim Moran				
107	Task 2 - Provide to the Department (or				Craig Morrison,Diane Alberigi,Duane Seidel,Helen Logan ,Peter Anania,TBD TN Lead Opp.				
108	Task 3 - All responsibilities under				Craig Morrison,TBD TN Lead Opp. Director,Tim Moran				
109	**Task 4 - Notify subcontractors of**	**30 days**			**Craig Morrison,Kelly Brown,TBD TN Lead Opp. Director**				
110	Notify all Individuals,	30 days			Craig Morrison,Kelly Brown,TBD Customer Service Agent 1,TBD Customer Service Agent 2,TBD				
111	**Task 5 - Complete all steps, deliverables**				**Craig Morrison,Diane Alberigi,Duane Seidel,Helen Logan ,Michael Mellody,Peter**				
112	Closeout review by Department				Craig Morrison,Diane Alberigi,Duane Seidel,Helen Logan ,TBD TN Lead Opp. Director,Peter				

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Reporting Requirements

In this section, we provide a sample of reporting documentation and capabilities that apply to the scope of work within the RFP.

ACES$ has a system in place to prepare and submit required reports to the state, Case Managers and Participants, according to federal, state, and program guidelines. As per Goal I, we revise these reports and formats based upon the Program Managers input after contract award. Our PAID and NOTE systems are capable of generating reports through the accounting and/or payroll system per individual program requirements.

ACES$ has the following standard reports, however, should a program require a variation on the reports listed below or additional reports, ACES$ has the ability to generate reports on-demand based on program specifications and data elements tracked. We plan to refine report formats and add additional reports during our start up period upon contract award. At that time we will also define frequency requirements.

- Monthly Consumer Expenditure Statement (MCES) (***Figure 48*** below)
- Monthly Enrollment Reports
- Quarterly Aggregate Expenditure Report
- Monthly and Quarterly Attendant/Employee Application Processing Report
- Quarterly Demographic Report
- Semi-Monthly Account Summary Reports
- Monthly Background Check Reports
- Complaint Reports
- Monthly Customer Service – Call Data Report

Additionally, we will grant access and give view rights to Program Manager to monitor all Participants served through the program. This enables Program staff to query and review, in real-time, budget amounts, payroll dates, employee hours, goods and services purchased, payroll expended in that period for each employee, total payroll amount, and the balance remaining in each monthly allocation to date.

We have provided a short sample list of the type of data represented on several of the reports listed above, below in **Table 12**. Please note all reports are not listed in the table. We are able to provide a complete list during report requirements gathering during the start up period. All data elements and frequencies are customizable.

Table 12: Sample of Reports and Corresponding Data Elements

Report	Data Elements
Quarterly Aggregate Expenditure Report	• Total number of Individuals enrolled with the FMS • Total of all individual allocations for each month during the quarter • Total unspent individual allocations for all Individuals during the quarter and a year-to-date of all unspent individual allocations • Total number of employees employed throughout the quarter • Average hourly wage paid to employees • Highest hourly wage paid to employees • Lowest hourly wage paid to employees • Total gross wages paid to all employees • Total hours billed by all employees • Total taxes withheld from all employees • Total administrative fee paid by DIDD or MCO to the contractor

Quarterly Employee Application Processing Report	• Total number of new employee applications received and fully processed
	    ○ Percent of applications received and processed within seven (7) business days ***(Note: the majority of completed application packets are processed in one (1) day)***
	    ○ Average days-to-process
	    ○ Background checks completed and dates run
	    ○ Number of applications denied due to background check concerns
	    ○ Training and certification status – available if tracked by program requirement

Quarterly Demographic Report	• Total number of new Individuals per month and total for the quarter • Total number of Individuals that withdrew from program per month and total for the quarter • Total number of Individuals that died per month and total for the quarter • Total number of employees terminated • Total number of background checks completed • Average number of employees per Individual • Total number of employees who were relatives of the Individual served • Total number of employees who were spouses of the Individual served • Total number of employees who are NOT related to the Individual served • Total number of complaints and grievances received • Total number of active Authorized Representatives (Surrogates) • Breakout of Authorized Representatives (Surrogates) serving more than one Individual **We would be able to add Total number of Employees serving across multiple programs and other similar data the state may find useful**
Department Monthly Report (*Figure 47*)	• Total expenditure of each Individual • Amount spent in excess of the Individuals' allocation (***Note: the Sample provided is for Colorado, which allows a certain monthly percentage overage, provided they do not exceed their yearly cap)*** • Individuals that enter and leave the program • Fraud, waste, and abuse

	• Individual Service and Spending Plan descriptions, and other required data, will be added • Identification of Individuals who have not utilized services within a pay period • Identification of any worker who does not submit timesheets or invoices for two (2) or more consecutive payroll periods (one (1) month or more) and notification of appropriate Program Manager and Case Manager

ACES$ is able to provide Program Managers with reports, as deemed appropriate. During the start-up phase, we will work with each program to determine the frequency and customization of reporting. The timeliness of these reports depends on the type being generated (monthly, quarterly etc.). ACES$ can output reports into PDF, Word or Excel formats. Turnaround on report requests over secure email are typically one (1) business day. Should programs prefer real-time access to reporting, we provide this through our online portal or email directly, upon request. Should the Program Managers desire, we would grant Case Managers access to Participant-specific information. Case Managers will have user-specific rights granted to them, based on agency caseload.

ACES$ tracks funds for individual spending plans in our PAID and NOTE software systems and will submit reports on utilization to Participants in an electronic or hard copy format, depending on Individual preference. We provide this report, shown as ***Figure 48*** below, on a monthly basis and in a user-friendly format. ACES$ can provide it to all Participants, Case Managers and the Program Manager, if desired. (***Meeting RFP Requirement: Section 2. E. Payroll Reports***)

The Program Manager can review the detailed MCES reports and/or elect to review the submitted Monthly Summary Report shown as ***Figures 48/49*** below. We distribute monthly budget reports to Program Managers within five business days after the second semi-monthly payroll period. This can be revised based on individual program requirement.

Figure 48: SAMPLE Monthly Expenditure Report

Client Name XXXXX R078
Certification Period: 4/1/2015 - 3/31/2016
SEP Agency: Rocky Mountain Options for Long Term Care
Case Manager Name: XXX XXXX

Statement Date 02/07/2016
Activity Period January 2016

SECTION 1 Summary of Activity for the Activity Period

Service Category	Annual Allocation	Monthly Allocation	Monthly Expenditures	Total Hours	Monthly Balance	Percent Utilized
T2025	$32,098.20	$3,209.82	$3,201.47	170.50	$8.35	99.74%
T2040	$850.00	$85.00	$85.00	-	-	100%

SECTION 2 Detail services by service type by attendant — January 1 - January 31, 2016

Personal Care

Attendant	Pay Period	Family (Y/N)	Service type	Hours	EE Rate	ER Cost to you	EE Gross Pay	ER Cost	Total Dollars
XXXX, XXXXX	01/15/2016	Y	Personal Care	30	$16.50	$2.28	$495.00	$68.31	$563.31
XXXX, XXXXX	01/31/2016	Y	Personal Care	32	$16.50	$2.28	$528.00	$72.86	$600.86
Total Personal Care							$1,023.00	$141.17	$1,164.17

Homemaker Services

Attendant	Pay Period	Family (Y/N)	Service type	Hours	EE Rate	ER Cost to you	EE Gross Pay	ER Cost	Total Dollars
XXXX, XXXXX	01/15/2016	Y	Homemaker	22.5	$16.50	$2.28	$371.25	$51.23	$422.48
XXXX, XXXXX	01/31/2016	Y	Homemaker	24	$16.50	$2.28	$396.00	$54.65	$450.65
Total Homemaker Services							$767.25	$105.88	$873.13

Health Maintenance

Attendant	Pay Period	Family (Y/N)	Service type	Hours	EE Rate	ER Cost to you	EE Gross Pay	ER Cost	Total Dollars
XXXX, XXXXX XXXX,	01/15/2016	Y	Health	30	$16.50	$2.28	$495.00	$68.31	$563.31
XXXXX	01/31/2016	Y	Health	32	$16.50	$2.28	$528.00	$72.86	$600.86
Total Health Maintenance							$1,023.00	$141.17	$1,164.17

Insurance

N/A

SECTION 3 CDASS Utilization for the Certification Period

Month	Allocation	Expenditures	Balance	Percent Utilized
4/1/2015	$0.00	$0.00	$0.00	N/A
5/1/2015	$0.00	$0.00	$0.00	N/A
6/1/2015	$3,209.82	$3,060.66	$149.16	95.35%
7/1/2015	$3,209.82	$3,154.53	$55.29	98.28%
8/1/2015	$3,209.82	$3,201.48	$8.34	99.74%
9/1/2015	$3,209.82	$3,098.20	$111.62	96.52%
10/1/2015	$3,209.82	$3,201.48	$8.34	99.74%
11/1/2015	$3,209.82	$3,098.20	$111.62	96.52%
12/1/2015	$3,209.82	$3,201.48	$8.34	99.74%
1/1/2016	$3,209.82	$3,201.74	$8.08	99.75%
Total QTD	$3,209.82	$3,201.74	$8.08	99.75%
Total YTD	$25,678.56	$25,217.77	$460.79	98.21%

Figure 49: Sample Department Monthly Report

Number of Current Clients in Program		####	Clients Who Entered Program	14	Clients Who Left the Program	0	
MonthDate	Medicaid Number	Client Name	Budget Alloc	Used Amount	Remaining Amount	Amount Utilizied	Fraud/Abuse
Jun-15	BXXXXXX	XXXX , XXXXXXXXX	3192.44	3060.66	131.78	95.87%	0.00
Jun-15	GXXXXXX	XXXX , XXXXXXXXX	6693.23	6523.02	170.21	97.46%	0.00
Jun-15	GXXXXXX	XXXX , XXXXXXXXX	1964.52	1940.01	24.51	98.75%	0.00
Jun-15	GXXXXXX	XXXX , XXXXXXXXX	4392.54	4381.3	11.24	99.74%	0.00
Jun-15	GXXXXXX	XXXX , XXXXXXXXX	978.23	943.97	34.26	96.50%	0.00
Jun-15	GXXXXXX	XXXX , XXXXXXXXX	1561.6	1486.8	74.8	95.21%	0.00
Jun-15	GXXXXXX	XXXX , XXXXXXXXX	3613.64	2988.63	625.01	82.70%	0.00
Jun-15	GXXXXXX	XXXX , XXXXXXXXX	4530.05	4534.07	-4.02	100.09%	0.00
Jun-15	GXXXXXX	XXXX , XXXXXXXXX	1943.16	1889.64	53.52	97.25%	0.00
Jun-15	GXXXXXX	XXXX , XXXXXXXXX	1236	1266.59	-30.59	102.47%	0.00
Jun-15	GXXXXXX	XXXX , XXXXXXXXX	1447.95	1421.94	26.01	98.20%	0.00
Jun-15	GXXXXXX	XXXX , XXXXXXXXX	1155.79	1153.94	1.85	99.84%	0.00
Jun-15	GXXXXXX	XXXX , XXXXXXXXX	1237.05	781.81	455.24	63.20%	0.00
Jun-15	DXXXXXX	XXXX , XXXXXXXXX	3051.13	2980.57	70.56	97.69%	0.00
Jun-15	KXXXXXX	XXXX , XXXXXXXXX	4892.96	4798.38	94.58	98.07%	0.00
Jun-15	KXXXXXX	XXXX , XXXXXXXXX	17075.73	17911.79	-836.06	104.90%	0.00
Jun-15	KXXXXXX	XXXX , XXXXXXXXX	2025.73	1975.28	50.45	97.51%	0.00
Jun-15	LXXXXXX	XXXX , XXXXXXXXX	1538.18	1536.3	1.88	99.88%	0.00
Jun-15	LXXXXXX	XXXX , XXXXXXXXX	2680.93	1837.87	843.06	68.55%	0.00
Jun-15	MXXXXXX	XXXX , XXXXXXXXX	7023.21	5986.45	1036.76	85.24%	0.00
Jun-15	NXXXXXX	XXXX , XXXXXXXXX	3118.93	3102.53	16.4	99.47%	0.00

Note: *This sample is from a Colorado Report where the Program allows Individuals to go over their monthly allotment, as long as they do not exceed a certain percentage threshold or their yearly amount. There is a built-in Coordinator and Client (Participant enrolled in the Program) alert mechanism and remediation policy, which includes training, for over-budgets in those scenarios. Our system is able to prevent over-budgets entirely, by rejecting timesheets that would cause an over-budget. These timesheets would require correction prior to resubmission.*

As mentioned earlier, Participants and Representatives are able to track their budget utilization, as frequently as they like, by simply going to our online NOTE system. The NOTE system tracks budget amounts, payroll dates, employee hours, payroll expended in that period for each employee, total payroll amount, the balance remaining in each monthly allocation to-date, goods and service information and other information needed to assist the Individual in managing their spending. Individuals are easily able to monitor monthly spending, as well as year-to-date expenditures.

In addition to the reporting and tracking capabilities mentioned above, ACES$ actively stays abreast of issues and trends that may affect those we serve. For example, The Consumer Financial Protection Bureau (CFPB) is releasing a set of tools and practices to help financial institutions recognize, report, and prevent financial exploitation of older Americans and Individuals with Disabilities. Upon its release, ACES$ will review and incorporate this information to improve our reporting, tracking, and training of Individuals.

We include all reports in our QA/QI Matrix as well as their frequency. During our audit of the reports, we confirm reports were submitted within the required timeframe, contained accurate data, and were sent securely.

Fraud and Abuse Reporting

As noted earlier, ACES$ has a vigorous written policy and procedure for handling and reporting all incidents of alleged abuse, alleged neglect, recipient death, as well as financial fraud and abuse to the appropriate state and federal offices, as needed. State law determines who and how we report these incidents and we will follow the Vermont Code of Regulations and program guidance. ACES$ will fully cooperate in all investigations of any reportable fraud, abuse, neglect or death, in accordance with applicable standards, rules, and laws.

ACES$'s current policy includes definitions of abuse and neglect, timeframes for reporting, preservation of evidence, and notification of officials, parents and guardians. We will modify these policies to conform to Vermont's program requirements, as appropriate. We will determine all state and local policies, contact information and procedures, whether verbal (telephonic or in-person), electronic, or other written forms, for reporting provider and recipient fraud and any type of abuse. Individuals and Employees, as well as Supports Coordinators, receive training from ACES$ regarding the proper procedures for reporting.

Real-time Online Reporting

As noted earlier, ACES$ PAID and NOTE online portal offers real-time online reporting that is customizable for every contract we serve. ACES$ is role-based, which means that Program Administrators have access to programmatic data. Program administrators may log into NOTE and review data for all FMS Participants and Employees. Regardless of the Participants/Employee submission method (paper timesheet vs. online submission), the system will show all data. **Figure 50** is an example of NOTE's reporting feature. For all of our contracts we are able to work with Administrators to determine what reports they would like to review frequently. These reports are available on the reporting tab in NOTE. The example shown is for our Wyoming contract. The reports that appear on NOTE for the Program Administrator are customizable. The reports are created from PAID and based on Administrator preference. **Figure 51** is an example of our Colorado report screen in PAID. The PAID screen shows all reports generated for the contract.

Figure 50: Report Tab in NOTE

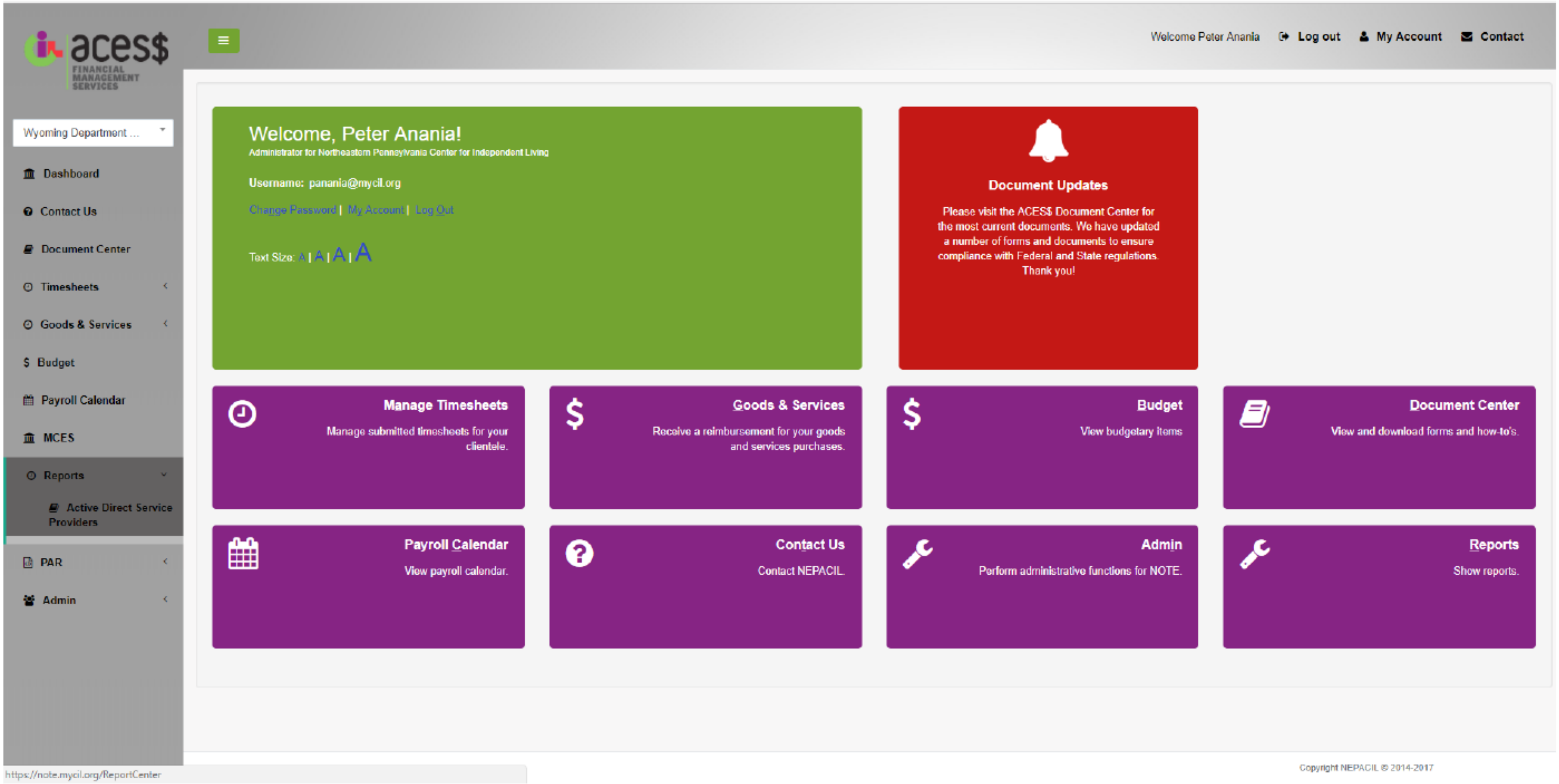

Figure 51: PAID Reporting Screen

Certificate of Compliance

We have provided a copy of the completed and signed Certificate of Compliance on the following pages as ***Figure 52***.

Figure 52: Certificate of Compliance

RFP/PROJECT:
DATE:
Page 1 of 3

CERTIFICATE OF COMPLIANCE

For a bid to be considered valid, this form must be completed in its entirety, executed by a duly authorized representative of the bidder, and submitted as part of the response to the proposal.

A. **NON COLLUSION:** Bidder hereby certifies that the prices quoted have been arrived at without collusion and that no prior information concerning these prices has been received from or given to a competitive company. If there is sufficient evidence to warrant investigation of the bid/contract process by the Office of the Attorney General, bidder understands that this paragraph might be used as a basis for litigation.

B. **CONTRACT TERMS:** Bidder hereby acknowledges that is has read, understands and agrees to the terms of this RFP, including Attachment C: Standard State Contract Provisions, and any other contract attachments included with this RFP.

C. **FORM OF PAYMENT:** Does Bidder accept the Visa Purchasing Card as a form of payment?

____ Yes ✓ No

D. **WORKER CLASSIFICATION COMPLIANCE REQUIREMENT:** In accordance with Section 32 of The Vermont Recovery and Reinvestment Act of 2009 (Act No. 54), the following provisions and requirements apply to Bidder when the amount of its bid exceeds $250,000.00.

Self-Reporting. Bidder hereby self-reports the following information relating to past violations, convictions, suspensions, and any other information related to past performance relative to coding and classification of workers, that occurred in the previous 12 months.

Summary of Detailed Information	Date of Notification	Outcome

Subcontractor Reporting. Bidder hereby acknowledges and agrees that if it is a successful bidder, prior to execution of any contract resulting from this RFP, Bidder will provide to the State a list of all proposed subcontractors and subcontractors' subcontractors, together with the identity of those subcontractors' workers compensation insurance providers, and additional required or requested information, as applicable, in accordance with Section 32 of The Vermont Recovery and Reinvestment Act of 2009 (Act No. 54), and Bidder will provide any update of such list to the State as additional subcontractors are hired. Bidder further acknowledges and agrees that the failure to submit subcontractor reporting in accordance with Section 32 of The Vermont Recovery and Reinvestment Act of 2009 (Act No. 54) will constitute non-compliance and may result in cancellation of contract and/or restriction from bidding on future state contracts.

RFP/PROJECT:
DATE:

E. **Executive Order 05 – 16: Climate Change Considerations in State Procurements Certification**

Bidder certifies to the following (Bidder may attach any desired explanation or substantiation. Please also note that Bidder may be asked to provide documentation for any applicable claims):

1. Bidder owns, leases or utilizes, for business purposes, space that has received:
   - ☒ Energy Star® Certification
   - ☐ LEED®, Green Globes®, or Living Buildings Challenge℠ Certification
   - ☐ Other internationally recognized building certification:

____

2. Bidder has received incentives or rebates from an Energy Efficiency Utility or Energy Efficiency Program in the last five years for energy efficient improvements made at bidder's place of business. Please explain:

HVAC credits for power/electricity; foam/fiberglass insulation in exterior walls and floor (radiant heat) for the conservation of heating & cooling.

3. Please Check all that apply:
   - ☐ Bidder can claim on-site renewable power or anaerobic-digester power ("cow-power"). Or bidder consumes renewable electricity through voluntary purchase or offset, provided no such claimed power can be double-claimed by another party.
   - ☐ Bidder uses renewable biomass or bio-fuel for the purposes of thermal (heat) energy at its place of business.
   - ☒ Bidder's heating system has modern, high-efficiency units (boilers, furnaces, stoves, etc.), having reduced emissions of particulate matter and other air pollutants.
   - ☒ Bidder tracks its energy consumption and harmful greenhouse gas emissions. What tool is used to do this? Portfolio Manager thru the U.S. Department of Energy (FERC)
   - ☐ Bidder promotes the use of plug-in electric vehicles by providing electric vehicle charging, electric fleet vehicles, preferred parking, designated parking, purchase or lease incentives, etc..
   - ☐ Bidder offers employees an option for a fossil fuel divestment retirement account.
   - ☒ Bidder offers products or services that reduce waste, conserve water, or promote energy efficiency and conservation. Please explain:

We recycle bottles, plastic, paper. Filters on water faucets.

____

4. Please list any additional practices that promote clean energy and take action to address climate change:

____

____

F. **Acknowledge receipt of the following Addenda:**

Addendum No.:________________ Dated:________________

Addendum No.:________________ Dated:________________

Addendum No.:________________ Dated:________________

Bidder Name: ACES$ FMS Contact Name: Timothy J. Moran

Address: 1142 Sanderson Avenue Fax Number: 570.344.7218

Scranton, PA 18509 Telephone: 570.344.7211 (ext. 707)

E-Mail: tmoran@mycil.org

By: Timothy J. Moran Name: Timothy J. Moran

Signature of Bidder (or Representative) (Type or Print)

END OF CERTIFICATE OF COMPLIANCE

20

Price Quotation/Proposed Reimbursement

ACES$ is pleased to submit our cost proposal for this procurement opportunity. We have included our price quotation within ***Table 13***.

Our ability to provide quality service, flexibility, robust online systems, superior customer service and Electronic Visit Verification (EVV) services at an exceptional price is our way of doing "good business" and providing a high value experience for our Individuals, Stakeholders and the State.

Table 13: Price Quotation

Program Cost							
Fiscal Employer Agent (F/EA) Services	**Contract Period Per Member Per Month Rate (PM/PM)**		**Option Period Per Member Per Month Rate (PM/PM)**		**Goods and Services Payments**	**Secure Documentation Solution**	**Electronic Visit Verification (EVV) PM/PM**
Program Description	**Year 1**	**Year 2**	**Year 3**	**Year 4**			**All Years**
Attendant Services Program(ASP)	$ 75.00	$ 75.00	$ 79.50	$ 82.50	Included in PM/PM	Included in PM/PM	$ 12.00
Children's Personal Care Services (CPCS)	$ 75.00	$ 75.00	$ 79.50	$ 82.50	Included in PM/PM	Included in PM/PM	$ 12.00
Choices for Care (CFC) (Including the Flexible Choices [FC] option and the Moderate Needs Group [MNG]	$ 75.00	$ 75.00	$ 79.50	$ 82.50	Included in PM/PM	Included in PM/PM	$ 12.00
Developmental Disabilities Services (DDS)	$ 75.00	$ 75.00	$ 79.50	$ 82.50	Included in PM/PM	Included in PM/PM	$ 12.00
Traumatic Brain Injury Respite (TBI)	$ 75.00	$ 75.00	$ 79.50	$ 82.50	Included in PM/PM	Included in PM/PM	$ 12.00
Billing Agent for Medicaid Self/Family Directed Hi-Technology Nursing (HTN) program	No Charge	No Charge	No Charge	No Charge			

Attachments

Attachment A: Scheduling, Tasks and Job Description Toolkit

ace$ FINANCIAL MANAGEMENT SERVICES

Developing Your Job Description and Schedule

You are ready to hire a personal assistant (worker). In this section, we will walk you through developing your job description, step by step.

STEP	TASK
STEP 1	Identify the tasks that must happen.
STEP 2	Identify tasks that you need/prefer to have happen but are flexible about when they happen.
STEP 3	Match what you want done to what you can pay for through your plan (ISP).
STEP 4	Develop a draft schedule to help you determine your preferences for when tasks are performed and how many hours your worker will need to perform those tasks.
STEP 5	Identify the skills and qualities for workers carrying out these tasks.
STEP 6	Write your job description with the information you have collected.

STEP 1:

Identify the tasks that must happen

The first step in creating a job description is to identify the tasks that must happen. Working with your Case Manager to develop your Individual Service Plan (ISP) may have already helped you decide what your needs are. These needs will become the tasks that your worker will do. If not, you can begin the process now using the Task Tool.

The Task Tool is included in this Toolkit. The Task Tool is formatted to help you consider a wide variety of tasks and activities. Use this tool to identify tasks important to you and consider how a worker can assist you. ***Note: you will only be able to pay your worker under self-direction for services you have been approved for under your plan.***

Also, remember that **natural supports** such as neighbors, friends and family can be used as a part of your daily routine and may help fulfill some of the tasks you need to have performed.

WHAT IS A NATURAL SUPPORT?

What about Assistive Technology?

Another area to look at is your current use of assistive technology and or equipment that might help you do some tasks more independently.

For example, you might decide to use a reacher device to access things more easily on your own, or a shower chair so you need less help showering.

Take this opportunity to make some choices about services you want, and those you need. Once you have completed the self-assessment process, whether by using the Task and Job Description Development Tool or in another way, you are ready to make a list of the tasks that your worker needs to perform.

To help you with your planning, you can use the Task Tool and Job Description Planning Worksheets. These worksheets have room to record your decisions for Steps 1, 2 and 3.

Starting with STEP 1

Step 1 is about identifying the tasks that you have decided **must** happen.

Areas to think about include Personal Care, Health and Safety, and Homemaker/Household assistance. Your ISP has identified services you are approved for under your waiver program. There may be some others you can think of as well that may be provided through a natural support.

STEP 2:

Identify tasks that you need/prefer to have happen but are flexible

Step 2 is about identifying tasks that you need/prefer to have happen, but are flexible about when they happen.

As you work through your list of tasks, breaking them down between Step 1 (required) and Step 2 (preferred) will help you prioritize what you worker needs to do on a daily basis.

STEP 3:

Matching your tasks to what you can pay for

Step 3 is about matching what you want done to what you can pay for through your approved plan (ISP)

Four subtasks within STEP 3 include:

- Determine how much time is needed to perform task (hours)
- Determine the frequency the task will be performed (how often)
- Check to see if the task/service is on your ISP
- Document if it will be a paid task

Determine how much time is needed to perform task (hours)

When you consider how much time it takes to perform a task, remember that in the beginning, a worker will be getting to know you and your work environment. It may take a worker longer to perform a task when they first start, but the longer they are with you, they may become more efficient. As you identify tasks, there may be some that are preferred, but not essential. These tasks may be added to a workers job function as they become more efficient and perhaps have more time during the workday. Also, there may be instances where tasks may take longer due to unforeseen circumstances. It is always good to add a little time to your estimates in the beginning.

Determine the frequency the task will be performed (how often)

When you consider how often a task will be performed, think about how important it is to your everyday needs. For example, bathing may happen daily; however vacuuming might only happen 1-2 times per week.

It is also important to consider what you daily activities are like now, as well as what they could look like if you had help. For example, you may only wash your hair twice a week because it is difficult for you, or a family member may only be able to assist you that often. You might prefer to do that task every day and if you had someone available, you could.

Check to see if the task/service is on your ISP

You will, as part of STEP 1 and STEP 2, determine what is on your ISP. There may be some items you have included in your worksheet that are specific and not necessarily listed on your ISP, but may be covered under a service for which you are approved. If you are unsure, it is helpful to speak with your Supports Broker and Case Manager.

Document if it will be a paid task

There may be some tasks identified that you may be able to accomplish as a natural support through assistance from your family, neighbors, or friends. Once you have all of your tasks listed, it may be easier to determine which tasks can be covered as a natural support, and which tasks have to be performed by a paid worker.

Finally, check it off if you wish to include the task in your job description.

TASK TOOL/WORKSHEET

Personal Care/Mobility/Health and Safety							
	Step 1	Step 2	Step 3				Add to Job Description
Tasks	Required	Preferred	Time Needed to Perform Task (hours)	Frequency (day / week)	On ISP	Paid Task	
Bathing							
Washing Hair							
Shaving							
Nail Care							
Skin Care							
Oral Care							
Bowel Care							
Bladder Care							
Dressing							
Feeding							
Meal Preparation							
Medication Management							
Medication Assistance							
Medication Reminders							
Transfers							
Positioning							

Homemaker/Chore Services

	Step 1	Step 2	Step 3				Add to Job Description
Tasks	Required	Preferred	Time Needed to Perform Task (hours)	Frequency (day / week)	On ISP	Paid Task	
Vacuuming							
Washing Dishes							
Laundry							
Yard Care							
Snow Removal							
Making Bed							
Dusting							
Cleaning Bathroom							
Washing Floors							
Shopping							
Trash Removal							

STEP 4:

Developing a Draft Schedule

Step 4 is about developing a draft schedule to help you determine your preferences for when tasks are performed, and how many hours your worker will need to perform those tasks.

You can use the Scheduling Tool to help document when you would like a task to occur and how long it will take. You can also calculate how many hours a worker is assigned.

aces$ FINANCIAL MANAGEMENT SERVICES

Homemaker/Chore Services Task Schedule								
Tasks	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Total hours
Vacuuming	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Washing Dishes	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Laundry	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Yard Care	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Snow Removal	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Making Bed	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Dusting	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Cleaning Kitchen	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Cleaning Bathroom	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Washing Floors	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Shopping	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Trash Removal	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Total Hours								

Personal Care/Mobility/Health and Safety Task Schedule

Tasks	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Total hours
Bathing	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Washing Hair	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Shaving	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Nail Care	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Skin Care	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Oral Care	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Bowel Care	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Bladder Care	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Dressing	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Feeding	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Meal Preparation	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Medication Management	❑AM ❑PM ❑PM	❑AM ❑PM ❑PM	❑AM ❑PM ❑PM	❑AM ❑PM ❑PM	❑AM ❑PM ❑PM	❑AM ❑PM ❑PM	❑AM ❑PM ❑PM	
Medication Reminders	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Transfers	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Positioning	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	❑AM ❑PM	
Total Hours								

STEP 5:

Identifying Worker Skills and Qualities

Step 5 is about identifying the skills and qualities for workers carrying out these tasks.

Everyone's needs are different. Taking the time now to identify the qualities and skills that are important to you, will help you make a successful match of person and job. Additionally, this is information you can use when you train your new worker to help them to succeed.

Finding the Right Employee Personal Preferences Worksheet			
About my Worker/Skills	**Very Important**	**Somewhat Important**	**Does Not Matter**
Male			
Female			
Older			
Night person			
Morning person			
Social			
Talkative			
Quiet			
Discrete			
Compassionate			
Likes animals			
Non-smoker			
Punctual			
Time management			
Flexible schedule			
Work commitment			
Building relationships			
Communication skills			
Teachable (willing to learn)			
Action oriented			
Problem solving			
Physical strength/ coordination			
Housekeeping			
Scheduling/reporting			
Record keeping			
Meal preparation			
Transferring/Positioning			
Bathing/Dressing			
Certifications (CPR etc.)			

How many workers do you need?

By now you have determined how many hours of service it takes to complete the tasks you need to live independently. You have thought about the skills and qualities you want your new worker to have.

Keep in mind this formula as you develop your workers schedule: your total hours of need should equal routine tasks + 25% allowance for occasional or unexpected events. Make sure to leave a little "cushion" of time to cover unexpected delays.

Total Hours = Routine Tasks + 25% Cushion

Consider hiring more than one worker. Many people say that hiring more than one worker provides for increased security and flexibility. It also may help you avoid overtime issues. By hiring more than one worker, you have a "pool" of workers to draw from if a worker is sick or needs time off.

For example: 45 hours of work per week, can be divided among 2 or 3 workers. This means:

- 2 employees working 22.5 hours per week, or
- 3 workers with 15 hours each per week.

Having a Back-up Plan is very important. For more information about schedule and emergency planning, see the Back-Up Planning Tool.

STEP 6:

Writing your job description

Step 6 is taking the information you have gathered from the previous steps to develop your job description.

You know:

- The tasks you want your worker to do;
- The number of hours you need and fit in your budget, and
- The skills and qualities your worker needs to accomplish the tasks.

You have the information you need to create a job description.

Job Description Worksheet

Job title:

Supervised by:

Job summary:

Work schedule:

Note: The worker must only work the hours that are listed above.
Any additional hours ***will not be paid*** *unless approved by your employer.*

Wages: Wages for this position are $ _____ per hour.

Total hours per week:

Benefits:

Qualifications:

Duties and responsibilities:

Attachment B: Back-Up Plan Toolkit

Back-up Plan Toolkit

This toolkit is designed to help Participants:

- Plan for the Unexpected
- Prepare a Back-Up Plan for Employee Absence

The toolkit provides:

- Employee Quick Contact Sheet (Worksheet)
- Emergency Planning Considerations
- Emergency Information Forms

Planning for the Unexpected - A Back-Up Plan

There will always be times when your employee may miss work or be late, regardless of how dependable they are. During the hiring process, you emphasize the importance of attendance and punctuality, as well as your expectation that they notify you in advance if they will be late or too sick to work. You have established the expectation that your worker will plan vacation and leave time in advance, and will not intentionally leave you without support. Sometimes the unexpected happens and you need to be prepared.

You can prepare for an unexpected absence ahead of time by developing a Back-up Plan. Keep ready the names and phone numbers of people you can call to fill in for your worker. A back-up worker may be a:

- Family member
- Neighbor
- Friend
- Former worker
- Agency worker* (*if allowed by your program)

It is important to notify the individuals you have in mind that you would like them to be a Back-up worker. Depending on the tasks you need them to perform, you should ask your Back-up worker(s) to shadow your worker once or twice, so they are familiar with your needs and expectations. Your Supports Broker may also be aware of workers that are flexible or want more hours on occasion. Sometimes your local Center for Independent Living (CIL) can refer you to workers looking for extra hours.

It is often a good idea to hire more than one worker. This creates a pool of workers, which can be helpful in times when a Back-up is necessary. If one worker is unable to work, the other may be able to trade shifts or fill in.

When developing your plan you may want to include information such as:

- Workers who are available on holidays
- Workers who are available on the weekends or overnight

Your Back-up worker must complete paperwork with ACES$, your payroll agent, in order to be paid for their services. It is a good idea to do that in advance; then their paperwork is already processed, rather than waiting until you need them to work. Depending on your program, your Back-up worker may need to have background checks or certifications, such as CPR, on file. Your Supports Broker will help you determine this if you are unsure. They will also provide you with a worker packet for your Back-up workers.

If you need a Back-up worker because a worker quit or was fired, you will need to notify ACES$, your payroll agent, immediately.

Back-Up Worker Contact Sheet

Worker Name	Phone Number(s)	Availability	Notes
	Home: Cell:		
	Home: Cell:		
	Home: Cell:		
	Home: Cell:		

Keep your Back-up workers names and telephone numbers where you keep your other emergency telephone numbers.

Emergency Planning

Emergency planning is a good idea for everyone. Having a plan for different types of emergencies, such as a medical emergency, hospitalization, fire, power outage, severe weather, and other natural disasters can help keep you safe and minimize any injury or damage.

When planning you should:

- Make a list of people to contact for each type of emergency.
- Make a plan who to contact, and how to contact them, if there is a power outage or natural disaster.
- Make a list of medications and/or equipment that you need to take with you if you have to evacuate your home.
- Have additional, unexpired medications available.
- Organize the information listed above; keep it together in an easily accessible location. Inform your workers, family and neighbors where the information is located.
- Store extra food and water in case of a severe weather emergency or other natural disaster.

It is important to think about your plan, but also to write it down so you can easily access the information in an emergency. Many people keep emergency information near the telephone. Share it with your worker during orientation and training.

Using the Emergency Information Worksheet may help you organize your information. Make a plan that works for you and addresses your needs.

You can use this form, or your own, to organize names, phone numbers and addresses for important information you may need in an emergency. This includes contact information for your doctor, insurance agent, hospital, family members, friends, and other medical information.

Emergency Plan and Procedures

Having emergency procedures written down will help you when training your worker. You will want to have procedures in place for different kinds of emergencies.

Things to think about:

- What is your plan in case of a fire, flood, power outage, or tornado?
- If there is an emergency that requires you leave your home, what are your evacuation routes and who should be called?
- In the event you have an emergency related to your disability, what does your worker need to do, who should s/he call, or where should s/he take you?

The following worksheet provides space to write:

- Who to call
- Phone numbers
- Your emergency plan for each potential scenario

This will help you think about each area that needs to be covered. Your Supports Broker can help you troubleshoot if you are unsure of what to do in a particular situation.

If the categories listed, are not the ones you want or need, replace them with your own that do meet your needs.

Emergency Plan

Disability/Medical Related Emergency:		
Who to Call: (please list in order of priority)		
1. **Name:**	**Relationship:**	**Phone Number:** **Home:** **Work:** **Cell:**
2. **Name:**	**Relationship:**	**Phone Number:** **Home:** **Work:** **Cell:**
3. **Name:**	**Relationship:**	**Phone Number:** **Home:** **Work:** **Cell:**
4. **Name:**	**Relationship:**	**Phone Number:** **Home:** **Work:** **Cell:**
Important Information and Plan:		

ace$ FINANCIAL MANAGEMENT SERVICES

Non-Disability/Medical Related Emergency:		
Who to Call: (please list in order of priority)		
1. **Name:**	**Relationship:**	**Phone Number:** **Home:** **Work:** **Cell:**
2. **Name:**	**Relationship:**	**Phone Number:** **Home:** **Work:** **Cell:**
3. **Name:**	**Relationship:**	**Phone Number:** **Home:** **Work:** **Cell:**
4. **Name:**	**Relationship:**	**Phone Number:** **Home:** **Work:** **Cell:**
Important Information and Plan:		

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Severe Weather/Natural Disaster Related Emergency:		
Who to Call: (please list in order of priority)		
1. **Name:**	**Relationship:**	**Phone Number:** **Home:** **Work:** **Cell:**
2. **Name:**	**Relationship:**	**Phone Number:** **Home:** **Work:** **Cell:**
3. **Name:**	**Relationship:**	**Phone Number:** **Home:** **Work:** **Cell:**
4. **Name:**	**Relationship:**	**Phone Number:** **Home:** **Work:** **Cell:**
Important Information and Plan:		

Power Outage Related Emergency:

Who to Call: (please list in order of priority)		
1. Name:	Relationship:	Phone Number: Home: Work: Cell:
2. Name:	Relationship:	Phone Number: Home: Work: Cell:
3. Name:	Relationship:	Phone Number: Home: Work: Cell:
4. Name:	Relationship:	Phone Number: Home: Work: Cell:
Important Information and Plan:		

List Allergies
1.
2.
3.
4.
5.
6.
Medications:
Notes:

Additional Phone Numbers
Police Department:
Fire Department:
Poison Control:
Supports Broker:
IF IN DOUBT, DIAL: 911

Attachment C: Financial Audit

NORTHEAST PENNSYLVANIA
CENTER FOR INDEPENDENT LIVING

FINANCIAL STATEMENTS
AND
SUPPLEMENTARY INFORMATION

JUNE 30, 2016 AND 2015

NORTHEAST PENNSYLVANIA CENTER FOR INDEPENDENT LIVING

TABLE OF CONTENTS
JUNE 30, 2016 AND 2015

JonesKohanski
Consultants | Certified Public Accountants

INDEPENDENT AUDITORS' REPORT

To the Board of Directors of
Northeast Pennsylvania Center for Independent Living:

Report on the Financial Statements

We have audited the accompanying financial statements of Northeast Pennsylvania Center for Independent Living (the "Organization"), which comprise the statements of financial position as of June 30, 2016 and 2015, and the related statements of activities and cash flows for the years then ended, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the Organization's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Organization's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

JonesKohanski & Co., PC
6 Brookhill Square South . Sugarloaf PA 18249 . Phone: 570.788.7000 . Fax: 570.788.7001
3939 Birney Avenue . Moosic PA 18507 . Phone: 570.941.2248 . Fax: 570.941.2236

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Northeast Pennsylvania Center for Independent Living as of June 30, 2016 and 2015, and the changes in its net assets and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Other Matters

Other Information

Our audits were conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedules of functional expenses on pages 12 and 13 are presented for purposes of additional analysis and are not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audits of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated in all material respects in relation to the financial statements as a whole.

Jones Kozlowski & Co., PC

March 30, 2017
Moosic, PA

NORTHEAST PENNSYLVANIA CENTER FOR INDEPENDENT LIVING

STATEMENTS OF FINANCIAL POSITION
JUNE 30, 2016 AND 2015

	2016	2015
ASSETS		
CURRENT ASSETS:		
Cash	$ 10,178,918	$ 8,693,164
Accounts receivable, net	13,685,646	11,053,675
Prepaid expenses	303,918	36,694
Total Current Assets	24,168,482	19,783,533
BENEFICIAL INTEREST IN SPECIAL NEEDS TRUST	106,491	124,048
PROPERTY AND EQUIPMENT, NET	3,972,431	3,232,527
	$ 28,247,404	$ 23,140,108
LIABILITIES AND NET ASSETS		
CURRENT LIABILITIES:		
Line-of-Credit	$ 2,500,000	$ -
Current portion of note payable	93,165	-
Accrued payroll	5,345,468	5,191,827
Accrued payroll taxes	3,229,289	2,406,149
Accounts payable	410,658	703,726
Contingent liability	4,278,344	4,278,344
Accrued FSA liability	21,199	22,647
Accrued expenses	5,463	-
Deferred revenue	9,175	2,000
Deferred compensation	256,435	343,103
Unclaimed property	6,436	5,830
Total Current Liabilities	16,155,632	12,953,626
LONG TERM LIABILITY:		
Note payable, net of current portion	391,703	-
NET ASSETS:		
Unrestricted	11,502,904	10,111,482
Temporarily Restricted	197,165	75,000
Total Net Assets	11,700,069	10,186,482
	$ 28,247,404	$ 23,140,108

The accompanying notes are an integral part of these financial statements.

NORTHEAST PENNSYLVANIA CENTER FOR INDEPENDENT LIVING

STATEMENTS OF ACTIVITIES
YEARS ENDED JUNE 30, 2016 AND 2015

	2016	2015
UNRESTRICTED NET ASSETS:		
Revenues and Support:		
Program service fees	$ 130,028,127	$ 115,478,582
Fees and grants from governmental agencies	253,705	248,432
Contributions	38,081	115
Interest	14,090	17,745
Total Unrestricted Revenues and Support	130,334,003	115,744,874
Net Assets Released from Restrictions:		
Restrictions satisfied by payments	75,000	55,535
Total Unrestricted Revenues, Gains and Other Support	130,409,003	115,800,409
Expenses:		
Program services:		
Assistance for disabled	127,205,798	113,992,773
Supporting services:		
Management and general	1,811,783	890,108
Total Expenses	129,017,581	114,882,881
CHANGE IN UNRESTRICTED NET ASSETS	1,391,422	917,528
TEMPORARILY RESTRICTED NET ASSETS:		
Contributions	197,165	75,000
Net Assets Released from Restrictions:		
Restrictions satisfied by payments	(75,000)	(55,535)
CHANGE IN TEMPORARILY RESTRICTED NET ASSETS	122,165	19,465
CHANGE IN NET ASSETS	1,513,587	936,993
NET ASSETS - BEGINNING	10,186,482	9,249,489
NET ASSETS - ENDING	$ 11,700,069	$ 10,186,482

The accompanying notes are an integral part of these financial statements.

STATEMENTS OF CASH FLOWS
YEARS ENDED JUNE 30, 2016 AND 2015

	2016	2015
CASH FLOWS FROM OPERATING ACTIVITIES:		
Change in net assets	$ 1,513,587	$ 936,993
Adjustments to reconcile change in net assets to net cash provided (used) by operating activities:		
Depreciation	587,021	358,787
Bad debt expense	276,165	190,244
Change in assets and liabilities:		
Accounts receivable	(2,908,136)	(2,268,868)
Prepaid expenses	(267,224)	20,178
Accrued payroll	153,641	1,021,596
Accrued payroll taxes	823,140	49,488
Accounts payable	(293,068)	593,446
Accrued expenses	5,463	-
Accrued FSA liability	(1,448)	5,725
Deferred revenue	7,175	2,000
Deferred compensation	(86,668)	12,164
Unclaimed property	606	(3,112)
Net Cash Provided (Used) By Operating Activities	(189,746)	918,641
CASH FLOWS FROM INVESTING ACTIVITIES:		
Capital expenditures	(1,326,925)	(233,239)
Change in value of beneficial interest	17,557	51,616
Net Cash Used By Investing Activities	(1,309,368)	(181,623)
CASH FLOWS FROM FINANCING ACTIVITIES:		
Proceeds from line-of-credit	2,500,000	-
Proceeds from note payable	500,000	-
Payments on note payable	(15,132)	-
Net Cash Provided By Financing Activities	2,984,868	-
NET CHANGE IN CASH	1,485,754	737,018
CASH - BEGINNING	8,693,164	7,956,146
CASH - ENDING	$ 10,178,918	$ 8,693,164
SUPPLEMENTAL INFORMATION:		
Cash paid for interest	$ 38,052	$ -

The accompanying notes are an integral part of these financial statements.

NOTE 1: NATURE OF OPERATIONS AND SIGNIFICANT ACCOUNTING POLICIES

Nature of Operations

The Northeast Pennsylvania Center for Independent Living (the "Organization") is a non-profit organization established in August of 1988. Its mission is to improve and enhance independent living options for people with disabilities.

The Organization operates a financial management services division, d.b.a. ACES$: "Avenues to Consumer Employer Services & $upport." ACES$ assists eligible Medicaid waiver program participants with payroll services while preserving the participants' right to choose who serves as their caregivers.

The majority of the Organization's funding is received through fees for service from several state Department's of Human Services.

Basis of Presentation

Financial statement presentation follows the recommendations of the Financial Accounting Standards Board. Under current standards, the Organization is required to report information regarding its financial position and activities according to three classes of net assets: unrestricted net assets, temporarily restricted net assets, and permanently restricted net assets.

Basis of Accounting

Revenue and expenses are recognized on the accrual basis. Revenue consists primarily of program service fees and grants which are recognized when earned. Expenses consist of the cost of providing the various programs and administrative expenses.

Cash

Cash consists of deposits held in both interest and non-interest bearing checking accounts.

Accounts Receivable

Accounts receivable are stated at the amount management expects to collect from outstanding balances. The Organization uses the allowance method of valuing doubtful accounts receivable. The allowance is based on historical experience and a review of the current status of existing receivables. Accounts receivable is stated net of allowances of $496,612 and $278,278 at June 30, 2016 and 2015, respectively.

NOTE 1: NATURE OF OPERATIONS AND SIGNIFICANT ACCOUNTING POLICIES (CONT'D)

Property and Equipment

Property and equipment are carried at cost less accumulated depreciation. Depreciation is calculated on a straight-line basis over the following estimated useful lives of the related assets:

	Years
Building	39
Furniture and equipment	3 - 7
Software	2 - 5
Vehicles	5

Construction-in-process consists of project costs at the CIL Transitional Skills Center, 530 Electric Street Scranton, Pennsylvania. Construction-in-process costs are accumulated until the project is complete and placed in service. At that time, the costs are transferred to the appropriate asset class and depreciation begins. The project was complete and placed into service September 1, 2016.

Expenditures for maintenance and repairs are charged to operations as incurred. Costs of replacements and renewals are capitalized.

Upon sale or other disposition, the asset account and related accumulated depreciation account are relieved, and any gain or loss is included in operations.

Deferred Revenue

Deferred revenue consists of fees received in advance of being earned.

Restricted and Unrestricted Support

Contributions received are recorded as unrestricted, temporarily, or permanently restricted support, depending on the existence and/or nature of any donor restrictions. Support that is restricted by the donor is reported as an increase in unrestricted net assets if the restriction expires in the reporting period in which the support is recognized. All other donor-restricted support is reported as an increase in temporarily or permanently restricted net assets, depending on the nature of the restriction. When a restriction expires (that is, when stipulated time restriction ends or purpose restriction is accomplished), temporarily restricted net assets are reclassified to unrestricted net assets and reported in the statement of activities as net assets released from restrictions.

NOTE 1: NATURE OF OPERATIONS AND SIGNIFICANT ACCOUNTING POLICIES (CONT'D)

Income Taxes

The Northeast Pennsylvania Center for Independent Living qualifies as a tax-exempt organization under section 501(c)(3) of the Internal Revenue Code and is a Pennsylvania nonprofit corporation. Accordingly, the Organization is not subject to Federal and state income taxes.

In accordance with the Financial Accounting Standards Board guidance on accounting for uncertainty in income taxes, management evaluated the Organization's tax positions and concluded that the Organization had taken no uncertain tax positions that require adjustment to the financial statements to comply with the provisions of this guidance. With few exceptions, the Organization is no longer subject to income tax examinations by Federal, state or local tax authorities for years before June 30, 2013.

Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

Advertising

The Organization expenses advertising costs as they are incurred.

Expense Allocations

Expenses incurred to directly carry out program activities are allocated to the applicable programs on a specific identification basis. Certain other indirect expenses are allocated to the programs based upon appropriate factors.

Reclassifications

Certain items in the June 30, 2015 financial statements have been reclassified to conform to the June 30, 2016 reporting format.

Subsequent Events

Management has evaluated subsequent events through March 30, 2017 which is the date the financial statements were available to be issued, for events requiring recording or disclosure in the financial statements for the year ended June 30, 2016.

NOTE 2: PROPERTY AND EQUIPMENT

Property and equipment consist of the following at June 30:

	2016	2015
Land	$ 50,000	$ 50,000
Building	2,587,917	2,587,917
Vehicles	15,893	15,893
Software	1,747,061	1,015,739
Furniture and equipment	685,492	664,239
Constuction-in-process	574,349	-
	5,660,712	4,333,788
Less: accumulated depreciation	1,688,281	1,101,261
	$ 3,972,431	$ 3,232,527

Depreciation expense for the years ended June 30, 2016 and 2015 was $587,021 and $358,787, respectively.

NOTE 3: DEMAND NOTE PAYABLE

The Organization has a $20,000,000 line-of-credit agreement with a bank which is secured by the accounts receivable of the Organization. At June 30, 2016, the balance outstanding was $2,500,000.

NOTE 4: NOTE PAYABLE

Note payable consists of the following at June 30,:

	2016	2015
Bank note payable in monthly installments of $9,189, including interest at 3.86%. The note matures April, 2021 and is secured by equipment and leasehold improvements.	$ 484,868	$ -
Less: current portion	(93,165)	-
	$ 391,703	$ -

NOTE 4: NOTE PAYABLE (CONT'D)

The minimum annual principal payments on the note as of June 30, 2016 are as follows:

Year ending June 30,	Amount
2017	$ 93,165
2018	96,831
2019	100,642
2020	104,589
2021	89,641
	$ 484,868

NOTE 5: SURPLUS-SHARING PLAN

The Organization offers a voluntary deferred 403(b) employee savings plan to all employees who work at least 20 hours in a normal work week. Employer contributions to the plan are at the discretion of the Board of Directors to eligible employees who are 21 years of age with 6 months of service. There was no employer contribution to the plan for the year ended June 30, 2016. Pension expense of $140,000 was charged to operations for the year ended June 30, 2015.

NOTE 6: ACCRUED VACATION PAY

All employees who regularly work more than twenty hours per week are eligible for paid time off ("PTO"). Accruals are based upon paid hours up to 2,080 hours (not including overtime). Employees who work less than forty hours per week but more than twenty will earn PTO hours on a pro-rated basis. Length of service will determine the rate at which employee will accrue PTO. Twenty-four hours of personal time will be added to the PTO balance annually upon the employees anniversary date. Employees who resign, separate or retire are eligible to receive payment for a maximum of up to 200 hours for full-time employees and 100 hours for part-time employees. Employees whose positions are eliminated through reduction in force, reorganization or their hours drop below 20 hours per week are eligible to be paid for all accumulated PTO hours banked on the effective date of the change. However, employees who fail to provide the appropriate two weeks notice for resignation forfeit all PTO hours. A liability for accrued vacation of $168,837 and $155,889 as of June 30, 2016 and 2015, respectively, is included in deferred compensation on the statement of financial position.

NOTE 7: POST RETIREMENT BENEFITS

The Organization has agreed to provide a previous executive director with lifetime health, dental and vision benefits. The previous executive director retired in July 2012 and is currently receiving benefits. The Organization funds this post-retirement benefit cost on a pay as you go basis. A liability for postretirement benefits of $87,598 and $146,214 as of June 30, 2016 and 2015, respectively is included in deferred compensation on the statement of financial position.

In addition, the Organization has agreed to pay a retirement benefit equal to 80% of the previous executive director's final salary, payable over four equal annual installments. At June 30, 2015, $41,000 was payable under the agreement and is included in deferred compensation on the accompanying statement of financial position. This retirement benefit was paid in full during the year ended June 30, 2016.

NOTE 8: CONTINGENT LIABILITY

The Organization is engaged in ongoing negotiations with the Pennsylvania Department of Human Services' Office of Long Term Living (OLTL) regarding Consumer Directed Personal Attendant Services (CD-PAS) funding received subsequent to January 1, 2011, when OLTL made changes to its provider service fee structure. These changes require providers to keep CD-PAS funding distinctly separate from other HCBS Waiver Program funding. Management, in consultation with legal counsel, has determined that it is reasonably possible that negotiations may result in the Organization repaying a portion, or all, of the CD-PAS funding in question, therefore the Organization has accrued the full amount of $4,278,344 at June 30, 2016 and 2015.

NOTE 9: CONCENTRATION OF RISK

The Organization maintains its cash balances in local financial institutions. The balances are insured by the Federal Deposit Insurance Corporation ("FDIC") up to $250,000. Uninsured bank balances at June 30, 2016 and 2015 totaled $10,948,849 and $7,937,286, respectively.

Investment accounts are not FDIC insured but are fully collateralized with pooled investments in securities of the U.S. government or its agencies or instrumentalities which are backed by the full faith and credit of the United States (such as U.S. treasury notes, bills or bonds and securities of the Federal Home Loan Bank). Included in uninsured bank balances are commercial sweep investments account balances of $6,269,977 and $5,520,608 at June 30, 2016 and 2015, respectively.

NOTE 9: CONCENTRATION OF RISK (CONT'D)

For the years ended June 30, 2016 and 2015, approximately 93% and 97% of unrestricted revenue and expenses, respectively; and 85% and 92% of accounts receivable, respectively; were incurred through a contract with the Illinois Department of Human Services. This contract will expire on June 30, 2018.

NOTE 10: OPERATING LEASES

The Organization leases office space on a month-to-month basis for their operations. Rental expense for these leases was $144,281 and $92,756 for the years ended June 30, 2016 and 2015, respectively.

NOTE 11: BENEFICIAL INTEREST IN SPECIAL NEEDS TRUST

The Organization is named beneficiary of a remainder interest in a charitable remainder trust. Upon the death of the primary beneficiary, the Organization will receive discretionary payments from the trustees for twenty years. After twenty years, the Organization will receive one-third of the remaining value of the Trust. The fair value of the beneficial interest is estimated using the fair value of the assets of the trust less the present value of the payments expected to be made to the beneficiary. The present value of the payments is calculated by using recent life expectancy tables and a risk adjusted discount rate of 4% at June 30, 2016 and 2015.

NOTE 12: RESTRICTED NET ASSETS

Temporarily restricted net assets are available for the following purpose:

	2016	2015
Autism program	$ 197,165	$ 75,000

NOTE 13: SUBSEQUENT EVENTS

In October 2016, the Organization was awarded a contract with the Georgia Department of Community Health to provide FMS services to clients in the state. In September 2016, the Organization began leasing office space for their operations in Georgia. The cancelable lease agreement requires an initial payment of $1,718 with monthly payments of $859 thereafter through December 2017.

NOTE 14: CIL CARES

The Commonwealth of Pennsylvania will soon issue a Request for Proposal (RFP) for Financial Management Services (FMS) for the disabled population they serve. The prior RFP required potential bidders to be "conflict free" in order to perform FMS. To be conflict free, a successful bidder organization cannot provide both Service Coordination and FMS. As of July 1, 2016, the Organization discontinued its Service Coordination programs and transitioned them to a newly formed, unrelated entity. For the fiscal year ending June 30, 2016, the Service Coordination programs accounted for 1.4% of revenues and 1.2% of expenses of the Organization. Discontinuing Service Coordination operations will have no operational or financial impact on the Organization.

NORTHEAST PENNSYLVANIA CENTER FOR INDEPENDENT LIVING

SCHEDULE OF FUNCTIONAL EXPENSES
YEAR ENDED JUNE 30, 2016

	Assistance for Disabled	Management and General	Totals
Salaries	$ 113,698,272	$ 965,499	$ 114,663,771
Payroll taxes	9,834,374	70,331	9,904,705
Employee benefits	1,278,108	364,478	1,642,586
Depreciation	563,540	23,481	587,021
Consulting services	130,374	225,796	356,170
Bad debt expense	276,165	-	276,165
Postage and delivery	203,013	3,725	206,738
Office expense	173,607	13,789	187,396
Travel	138,181	29,209	167,390
Subcontractors	139,452	6,504	145,956
Rent expense	144,281	-	144,281
Data processing expense	111,613	22,120	133,733
Insurance	109,470	12,949	122,419
Program supplies	89,030	-	89,030
Utilities	72,452	14,361	86,813
Advertising	45,980	19,988	65,968
Professional fees	39,528	9,793	49,321
Interest	38,052	-	38,052
Repairs and maintenance	28,671	5,996	34,667
Meeting expense	23,255	6,506	29,761
Miscellaneous	25,863	2,620	28,483
Training	15,757	5,314	21,071
Donations	11,154	5,988	17,142
Dues and subscriptions	13,314	2,334	15,648
Publications	2,292	1,002	3,294
	$ 127,205,798	$ 1,811,783	$ 129,017,581

See independent auditors' report.

SCHEDULE OF FUNCTIONAL EXPENSES
YEAR ENDED JUNE 30, 2015

	Assistance for Disabled	Management and General	Totals
Salaries	$ 100,622,250	$ 532,239	$ 101,154,489
Payroll taxes	9,370,175	43,079	9,413,254
Employee benefits	1,029,800	97,550	1,127,350
Data processing expense	605,185	9,018	614,203
Subcontractors	378,878	2,707	381,585
Depreciation	343,107	15,680	358,787
Consulting services	235,502	119,176	354,678
Advertising	192,710	19,637	212,347
Office expense	199,778	11,002	210,780
Bad debt expense	190,244	-	190,244
Travel	174,841	2,666	177,507
Postage and delivery	166,915	938	167,853
Rent expense	92,756	-	92,756
Utilities	84,301	8,418	92,719
Insurance	75,692	9,460	85,152
Program supplies	82,038	-	82,038
Training	29,742	2,333	32,075
Repairs and maintenance	25,639	3,160	28,799
Meeting expense	23,831	2,291	26,122
Professional fees	20,922	2,228	23,150
Dues and subscriptions	17,636	4,100	21,736
Donations	17,454	2,005	19,459
Miscellaneous	7,397	2,119	9,516
Publications	5,980	302	6,282
	$ 113,992,773	$ 890,108	$ 114,882,881

See independent auditors' report.

Attachment D: QA/QI Matrix

Reviewer	COO, Craig Morrison, Diane Alberigi, Duane	Review Frequency	Bi-weekly, Monthly, Quarterly						
Requirement	**Performance Measurement**	**Performance Threshold**	**Review Process and Sample Size**	**Compliant Y/N**	**Compliant Current Process/Documents Reviewed**	**Not Compliant Reason and Remediation**	**State Input Needed Y/N**	**Date of Review**	**Reviewer Notes**
Number and percent of payments accurately made to Employees based upon all timesheets with an authorized signature, established rate of pay, and taxes deducted accurately.	Bi-weekly	98%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued. (% of payroll issued was incorrect.) Number and percent of payments accurately made to Employees based on all timesheets with an authorized signature, established rate of pay, and taxes deducted accurately.	Y	Reviewed sample of 10 for number of issues /errors in payroll issued. - see notes			6/5/2017	sample of 10 clients chosen. 5 for Sept/2016, and 5 for March/2017. All documents reviewed for these ten clients for compliance with payroll / accounting / tax ops.
Employees are paid within the minimum and maximum rate limits set by the program and match the current Participant/Employee rate form on file.	Bi-weekly	98%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued. (% of payroll issued was incorrect.) Review (no longer a max rate on BHD rates only LTC).	Y	Reviewed 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued.			6/5/2017	
Employees are not paid overtime required and do not exceed 40 hours.	Bi-weekly	98%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued.(OT not allowed in WY).	Y	Reviewed 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued.			6/5/2017	
Comply with all federal and state laws for payment of household employees.	Bi-weekly	98%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued.	Y	Reviewed 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued.			6/5/2017	

Verify expenditures/payroll are authorized in the Participant's Plan of Services budget, before making any payment.	Bi-weekly	98%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued.	Y	Reviewed 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued.			6/6/2017	
Monitor Participant budgets and provide detailed monthly statements of account activity.	Bi-weekly	98%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued.	Y	Reviewed 10 random sample of Employee timesheets against payroll issued and monthly statements and online budget information.			6/6/2017	
Process and issue payment for Participant's Employee payroll, within the appropriate payroll schedule.	Bi-weekly	98%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued. Review that TS is submitted on time and correct, and if not when was it paid.	Y	Reviewed 10 random sample of Employee timesheets against payroll issued. Review number of errors/ issues in payroll issued			6/5/2017	
Submit all required reports, withholding and payment actions according to federal and state tax laws and regulations. The Vendor will be responsible for all late payments, penalties, and/or interest.	Quarterly	98%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Pulling 10 random Employer tax filings to check for compliance.	Y	Reviewed 10 random sample of Employer tax filings to check for compliance.			5/30/2017	Review provided options of updating process - as result Revisited and developed clearer process to better handle this in future quarters, exploring other options to receive paperwork in a more efficient manner.
Maintain and follow written policies and procedures for filing all applicable forms, required by the state and federal government, for purposes of withholding, paying and reporting state income tax, unemployment tax, or both, for each individual it represents, for revoking these responsibilities, for monitoring filings and revocations and for maintaining the relevant documentation in each individual's file.	Quarterly	100%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review policies and procedure document to ensure process is up to date. Random selection of Participant files, Policy and procedure docs to ensure process is followed.	Y	Reviewed policies and procedure document to ensure process is up to date. Random selection of Participant files to ensure process was followed.			6/20/2017	

Written internal controls to monitor the distribution of Medicaid funds to ensure funds are only being utilized to pay for approved services.	Quarterly	100%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: N/A Process: Review billing policies and procedures document to ensure disbursement of funds process is up to date.	Y	Reviewed billing policies and procedures document to ensure disbursement of funds process is up to date.			6/20/2017	
Maintain and follow written policies and procedures to pay Employees in compliance with federal and state Department of Labor wage and hour rules for regular and overtime pay.	Quarterly	96%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review policies and procedure document to ensure payroll processing and documentation requirements are up to date and reflect DOL and Overtime. Random selection of Participant files to ensure all required forms are filled out correctly and are maintained, Employee payroll verify against Policy and procedure docs to ensure process is followed.	Y	Reviewed policies and procedure document to ensure payroll processing and documentation requirements are up to date and reflect DOL and Overtime requirements. Reviewed random selection of Participant files to ensure all required forms are filled out correctly and are maintained, and Employee payroll was verified against Policy and procedure docs to ensure process is followed.			6/20/2017	
Maintain and follow written policies and procedures for distributing, collecting, verifying and processing Employee's timesheets. The timesheets will be capable of accommodating the actual time and hours worked, including work days with split shifts. Internal controls for monitoring this process must be included in the system and described in the policies and procedures.	Annually	100%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: N/A Documentation/Review Process: Review policies and procedure document to timesheet, timesheet instructions and timesheet processing as well as updates to tracking systems in PAID and NOTE requirements are up to date. System automatically kicks out incorrect TS, Annual review will be to test the system to ensure it works.	Y	Reviewed policies and procedure document for timesheet, timesheet instructions and timesheet processing as well as updates to tracking systems in PAID and NOTE requirements. All are up to date. Verified kick outs occurring as required based on business rules.		(we do not use actual time we use 15min increments)	6/20/2017	

Maintain and follow written policies and procedures for developing and maintaining a database proven to be effective in tracking and responding to occurrences of timesheet over billing and timesheets that can not be paid due to missing or erroneous information. Internal controls for monitoring this process must be included in the system and described in the policies and procedures. The Vendor must be able to appropriately address and respond to such situations in a timely manner.	Monthly	100%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: N/A Documentation/Review Process: Review policies and procedure document to timesheet, timesheet instructions and timesheet processing as well as updates to tracking systems in PAID and NOTE a requirements are up to date. System automatically kicks out incorrect TS, Monthly review will be to test the system to ensure it works by testing with timesheets that have over hours etc.	Y	Reviewed policies and procedure document for timesheet, timesheet instructions and timesheet processing as well as tracking systems in PA D and NOTE. All processes and systems are up to date. Tested the system to ensure it works by running test scenarios with timesheets that have over hours etc. to ensure kick outs occur correctly as per business rules and process requirements.			6/20/2017	
Maintain and follow written policies and procedures for paying/ withholding FICA (Medicare and social security taxes) and federal income tax withholding, filing an IRS Form 941 quarterly in the aggregate using the Vendor Fiscal/Employer Agent's separate FEIN for all individuals it represents, and for maintaining a copy of each IRS Form 941 filed in the Vendor Fiscal/Employer Agent's files. Internal controls for monitoring this process must be included in the system and described in the policies and procedures.	Quarterly	100%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: All forms Documentation/Review Process: Review policies and procedure document to FICA and IRS Form 941 are up to date. Review quarterly document in Tax/Accounting Records, review returns filed.	Y	Reviewed policies and procedure document for FICA and IRS Form 941. Policies and procedures are up to date. Reviewed quarterly document in Tax/Accounting Records, and review returns filed to ensure compliance.			6/20/2017	
Maintain and follow written policies and procedures for paying/withholding federal unemployment taxes (FUTA) and for filing an IRS Form 940 in the aggregate using its separate FE N for all individuals it represents annually and maintaining a copy of each RS Form 940 filed in the Vendor Fiscal/Employer Agent's files. The Vendor must be able to respond to any changes in RS policy related to FUTA filing in the future. Internal controls for monitoring this process must be included in the system and described in the policies and procedures.	Quarterly	100%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: All forms Documentation/Review Process: Review policies and procedure document for FUTA and IRS Form 940 are up to date. Review quarterly document in Tax/Accounting Records, review returns filed.	Y	Reviewed policies and procedure document for FUTA and IRS Form 940. Policies and procedures are up to date. Reviewed quarterly document in Tax/Accounting Records and reviewed returns filed to ensure compliance.			6/20/2017	

Maintain and follow written policies and procedures to determine if the individual's Employees are family members who might be exempt from FICA, FUTA and SUTA and for processing them accordingly.	Quarterly	100%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review policies and procedure document for determining if the individual's direct support persons are family members who might be exempt from FICA, FUTA and SUTA and for processing them accordingly are up to date. Random selection of Participant payroll in PAID and NOTE, and Participant files in laser fisch to certification form and other relevant forms are maintained and FICA, FUTA and SUTA is withheld correctly. Forms are processed and tracked correctly.	Y	Reviewed policies and procedure document for determining if the individual's direct support persons are family members who might be exempt from FICA, FUTA and SUTA and for processing them accordingly. Policies and procedures are up to date. Reviewed random selection of Participant payroll in PAID and NOTE, and Participant files in laser fisch to certification form and other relevant forms are maintained and FICA, FUTA and SUTA is withheld correctly. Forms are processed and tracked correctly.			6/20/2017	
Maintain and follow written policies and procedures for registering individuals as an employer and obtaining the appropriate state employer registration number for WY state unemployment tax filing and payment purposes for all individuals' it represents, and maintaining the relevant documentation in the Vendor Fiscal/Employer Agent's files.	Quarterly	98%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review policies and procedures document to ensure processes are up to date. Random selection of Participant files in Laser fiche to ensure forms are maintained and process is followed.	Y	Reviewed policies and procedures document. Policies and processes are up to date. Reviewed random selection of Participant files in Laser fiche to ensure forms are maintained and process is followed.			6/20/2017	
Maintain and follow written policies and procedures for retiring an individual's state unemployment tax registration number when the individual no longer is the employer of direct support persons (permanently).	Quarterly	98%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review policies and procedure document to ensure processes are up to date. Random selection of Participant files in Laser fiche to ensure forms are maintained and process is followed.	Y	Reviewed policies and procedure document. Policies and procedures are up to date. Reviewed random selection of Participant files in Laser fiche to ensure forms are maintained and process is followed.			6/20/2017	

Maintain and follow written policies and procedures for managing the application of all garnishments, levies and liens on independent service providers' payroll checks in an accurate and timely manner and for maintaining the relevant documentation in the Vendor Fiscal/Employer Agent's files.	Quarterly	100%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 100% of those that have garnishments are sampled Documentation/Review Process: Review policies and procedure document to ensure processes are up to date. Review Participant files in laser fisch to ensure forms are maintained and process is followed.	Y	Reviewed policies and procedure document. Policies and procedures are up to date. Reviewed Participant files in Laser fiche to ensure forms are maintained and process is followed.			6/20/2017	
Maintain and follow written policies and procedure for managing improperly cashed or issued checks, stop payment on checks and the re-issuance of lost, stolen or improperly issued checks for direct support persons at no expense to the individual or the Department.	Quarterly	100%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: Review 100% of reissued checks for one random payroll cycle Documentation/Review Process: Review policies and procedures document to ensure processes are up to date. Review sample to ensure process is followed.	Y	Reviewed policies and procedure document. Policies and procedures are up to date. Reviewed sample selection of Participant files in Laser fiche to ensure forms are maintained and process is followed.			6/20/2017	
Maintain and follow written polices and procedures for processing Employee's direct deposits.	Quarterly	100%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 Documentation/Review Process: Review policies and procedures document to ensure processes are up to date. Review Random selection of Direct deposits forms and verify that an accurate DD was made and deposited correctly or if an error was made/paper check issued.	Y	Reviewed policies and procedures document. All policies and processes are up to date. Reviewed random selection of direct deposit forms and verified that an accurate DD was made and deposited correctly or if an error was made/paper check issued.			6/20/2017	
Maintain and follow written policies and procedures for refunding over collected FICA to applicable individual-employers or to the State of WY and applicable direct support persons.	Annually	100%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 1% of the people that earn less than $2,000. Documentation/Review Process: Review policies and procedure document to ensure processes are up to date. Run report to view those that are eligible for FICA refund and verify it was issued/received.	Y	Reviewed policies and procedure document. Policies and processes are up to date. Ran report to view those that are eligible for FICA refund and verified it was issued/received.			6/20/2017	

Maintain and follow written policies and procedures for preparing, filing and distributing IRS Forms W-2, Wage and Tax Statement for individuals' direct support persons per IRS instructions for Agents, for electronic filing when processing 250 or more IRS Forms W-2 and for maintaining the relevant documentation in the Vendor Fiscal/Employer Agent's files.	Annually	100%	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: N/A Documentation/Review Process: Review policies and procedure document to ensure processes are up to date.	Y	Reviewed policies and procedure document. Policies and processes are up to date.			6/20/2017	
Maintain and follow written policies and procedures for preparing, filing and distributing IRS Forms W-3, Transmittal of Wage and Tax Statements in the aggregate for all individuals the Agency represents per IRS instructions for Agents (when IRS Forms W-2 are not been submitted electronically) and for maintaining the relevant documentation in the Vendor Fiscal/Employer Agent's files.	**N/A**	**N/A**	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: Documentation/Review Process: **electronically file N/A**	N/A				6/20/2017	
Verify the participant has a current authorization for SD prior to authorizing payment for goods/Services and timesheets.	Bi-weekly (timesheets) quarterly (Goods and Services)	100%	Department/Staff Responsible for activity: Tax Operations Director Sample Size: 10 Documentation/Review Process: System automatically validates to ensure individual is active in the system. Individuals can only be active if they are current with authorizations. If not active individual can not submit timesheets and payroll will not be issued. Goods and service payments will be verified that they were made for authorized purchases.	Y	Reviewed goods and service payments to ensure payments were made for authorized purchases. Reviewed random sample to ensure active individuals in system had current authorizations.			6/6/2017	
Issue out of cycle payments to pay participants' DSWs if an error has been made by the FMS or State.	As needed	100%	Department/Staff Responsible for activity: Payroll Director Sample Size: 100% Documentation/Review Process: we issue supplemental payroll. Review sample of such payments to ensure compliant.	Y	Reviewed sample of supplemental payments to ensure compliant.			6/8/2017	
100% of payroll payments to DSWs will be calculated correctly.	Bi-weekly	100%	Department/Staff Responsible for activity: Payroll Director Documentation/Review Process: Review sample of such payments to ensure compliant.	Y	Reviewed sample of payments to ensure compliant.			6/5/2017	

Process and pay invoices for goods and services after verifying G&S are authorized in the participants approved POC.	Quarterly (Goods and Services)	100%	Department/Staff Responsible for activity: Tax Operations Director Sample: 10 Documentation/Review Process: System automatically validates to ensure individual is active in the system. Individuals can only be active if they are current with authorizations. If not active individual can not submit good and service request and reimbursement will not be issued. Goods and service payments will be verified that they were made for authorized purchases.	Y	Reviewed random sample to ensure validations in system are functioning correctly and that goods and service payments were made for authorized purchases only.			6/7/2017	
Have documented systems and controls in place to detect instances of overbilling or timesheets that cannot be paid due to missing or incorrect information. Notifying DSWs of the issue within 2 business days of identifying the issue.	Bi-weekly	100% for policy 98% Notification within 2 business days	Department/Staff Responsible for activity: Payroll/Tax Ops Sample Size: 10 kick outs Documentation/Review Process: Review policies and procedure document to ensure process is up to date. Review random selection of kick outs in PAID to ensure process is followed.	Y	Reviewed policies and procedure document. Process and policy is up to date. Reviewed random selection of kick outs in PAID to ensure process is followed.			6/20/2017	
Have systems and documented P&P to ensure appropriate taxes and forms are withheld, filed and deposited on behalf of individuals in accordance to IRS and State rules. Obtain a FEIN for all participants or representatives and all forms should be filed using participant's separate FEIN.	Annually	100% for policy 96% following policy and processing accordingly	Department/Staff Responsible for activity: Payroll Director Documentation/Review Process: Review policy and procedure and sample of forms in random selected participant files to ensure compliant. Sample Size:10	Y	Reviewed policy and procedure and sample of forms in random selected participant files to ensure compliant.			6/20/2017	
Process wage information requests form qualified Federal and Sate agencies and maintain documentation in DSWs file.	Quarterly	100%	Department/Staff Responsible for activity: CS and Enrollment Agents Documentation/Review Process: Review spreadsheet tracking requests for information and types of information submitted. Sample Size: 10 - depending on number requested for month	Y	Reviewed spreadsheet tracking requests for information and types of information submitted to ensure compliance.			6/6/2017	
Accept timesheets to be submitted electronically and make accommodations for paper time sheets on an as needed basis.		100%	Already compliant	Y				6/5/2017	

Direct deposit checks to the DSW with check voucher statement being sent directly to the DSW.	Bi-weekly	100%	Department/Staff Responsible for activity: Payroll Documentation/Review Process: Review payroll processing data to ensure DD was complete and statement mailed to DSW by reviewing that pay stub was printed and mailed. Verify number/cost of mailing against number issued. Sample Size: 10	Y	Reviewed random sample of payroll processing data to ensure DD was complete and statement mailed to DSW by reviewing that pay stub was printed and mailed. Verified number/cost of mailing against number issued.			6/5/2017	
EFT payments made within 5 business days after deadline for receiving approved goods & services requests.		98%	Department/Staff Responsible for activity: Billing Department/ Payroll Dept. Sample Size: 10 Documentation/Review Process: Random selection of Billing files and payroll disbursement to ensure claims, and payroll are correct, timely and process is followed.	Y	Reviewed random selection of billing files and payroll disbursement to ensure claims, and payroll were correct, timely and process was followed.			6/5/2017	All goods and services reimbursements are processed within 5 business days of receipt of complete, approved reimbursement request.