

Attachments



www.gtindependence.com

GT Independence

John H. Carmichael

jcarmichael@gtindependence.com

Sturgis, MI

Senior Executive with 15 years of health care experience. Concentration in services for people with disabilities and long term care needs. Extensive experience in Medicaid. Promotes the public good. Experience in public service, public speaking and government affairs. Entrepreneurial. Motivator. Assertive. Protector. Competitor. Leads by inspiring others.

WORK EXPERIENCES

GT Independence, Sturgis, MI December 2004- Present

Chief Executive Officer 2016-Present

- Develop and Execute GT Independence's Strategic Priorities
- Develop the Executive Team
- Represent the Company to Media and other Public Stakeholders

Chief Operating Officer 2012-Present

- Partner with CEO to guide Company
- Develop and Improve Company Operations including Customer Service, Payroll, Billing and IT
- Manager Customer Satisfaction
- Stay Up-to-Date on Industry Trends

Director of Business Development

- Executive over Customer Service and Field Service Departments
- Manager of Marketing
- Strategic Planning
- Responsible for Expansion of Services into New Markets, New States

City of Sturgis, MI November 2007 – February 2011

Mayor

- Oversee City Manager
- Engage in Civic Planning, Community Development, Budgeting, Government Operations
- Make Speeches, Public Relations Events, Media Relations
- Preside over City Commission Meetings
- Youngest Mayor in Sturgis History

EDUCATION

Tri-State University, Angola, IN

Bachelor of Science in Business Administration – Concentration in Marketing, May 2003

RELEVANT COURSES

Buyer behavior, marketing research, international marketing, personal selling, strategic management, accounting, managerial finance, marketing management, business law, employment law, business communications, database management, public speaking

COMPUTER PROFICIENCY

Capable Windows and MacOs user. Advanced knowledge of MS Office applications such as Word, Office, Excel, Access, PowerPoint. SQL.

ACTIVITIES/PERSONAL INTERESTS

Spy novels, sailing, playing the guitar and most sports, especially tennis.

Holly A. Carmichael, BSW
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 Sturgis, MI 49091
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OBJECTIVE:

To consistently be the standard of excellence for self-directed financial management services and ensure that self-direction and choice is available to all individuals.

SUMMARY OF SKILLS:

- Focused leader, respected by team members and recognized for delivering superior results
- Ability to develop, prioritize, and implement strategic plans and innovative ideas
- Comprehensive knowledge of self-directed services including industry trends and software
- Creative thinking, decision making, and project management skills
- Strong written and verbal communication skills

EXPERIENCE:

06/10 – Present **GT Independence** Sturgis, MI

Chief Operating Officer (02/16-Present)

Director of Customer Relations (06/10-02/16)

- Collaborate and develop company's strategy, vision, and goals
- Develop budget forecast and monitor resource needs based on growth
- Responsible for all operations including Customer Service, Payroll, Processing, and IT
- Member of Business Development Team, Quality Management Team, and CARF Committee
- Effectively coordinate with agency representatives and work collaboratively within a multi-disciplinary team
- Handle escalated issues including investigating, troubleshooting, and developing long-term solutions
- Develop effective policies, procedures, and workflows
- Develop and coach management team to effectively supervise 100+ front line employees
- Improved Customer Satisfaction by 5% over two years
- Developed Operational Standards and regular metrics to monitor and improve performance

11/11 – 12/13 **Blue Skies Adult Day Center** Sturgis, MI

Director

- Developed effective adult day services program including policies and procedures
- Assessed clientele in multiple areas including activities of daily living and psychosocial functioning
- Organized appropriate community activities for individuals and linked with community resources
- Developed marketing materials and a marketing plan
- Marketed services in the community including presentations and radio interviews
- Negotiated contracts and completed grant proposals
- Prepared billing to multiple agencies as well as private pay individuals

06/10 – 12/13 **Michigan Agency with Choice** Sturgis, MI

Director

- Managed files for 200+ clients and 30+ employees
- Scheduled needed services and linked clients with community resources
- Organized community activities for groups of individuals
- Worked collaboratively with a multi-disciplinary team
- Improved compliance audit results by 15% over the course of the first year
- Lead committee member to acquire CARF Accreditation for direct services provided

04/11-07/11 **Community Mental Health and Substance Abuse Services of St. Joseph County**

Intern

- Completed Intake Assessments and treatment recommendations
- Completed Individualized Plan of Service through person-centered planning
- Developed discussion topics and materials to lead group therapy sessions

03/09-06/10 **GT Independence**

Sturgis, MI

Supported Employment Specialist

- Established and developed a Supported Employment Program
- Assisted individuals with disabilities to find and maintain competitive employment
- Developed relationships with local businesses
- Worked collaboratively with multi-disciplinary teams
- Developed appropriate on-the-job accommodations as needed
- Acquired industry expertise in Social Security and Medicaid benefits while working

09/08-03/09 **St. Joe Community Co-op**

Sturgis, MI

*Job Development Specialist (09/08-03/09)**Job Coach (06/07-09/08)*

- Effectively marketed the St. Joe Community Co-op
- Presented to local businesses, chambers, and community organizations
- Established and maintained relationships with business partners
- Developed accommodations needed for individuals to complete jobs
- Organized parts needed for jobs including inspecting received product
- Accurately documented completed jobs and reviewed for quality assurance
- Provided a safe environment for all members

EDUCATION:June 2011, Bachelor's of Social Work Magna Cum Laude, *Western Michigan University*December 2008, Associate of Arts with Honors, *Kalamazoo Valley Community College*

1404 Hammel Drive
Angola, IN 46703
(260) 450-7967
cmmiller7911@mediacombb.net

SUMMARY OF EXPERIENCE

A self motivated individual with progressive experience in managing accounting departments with excellent communication skills. I am goal-oriented and thrive on opportunities for the accomplishment of professional objectives by working independently or as part of a team. I am an ethical, honest and hard working individual that will not just do the job, but take ownership and pride in the position. Also, proficient at coordinating and managing projects with a proven track record of reducing costs.

EMPLOYMENT

GT Independence, LLC, Sturgis, MI

2014 to Present

Chief Financial Officer working with company partners to maximize profits and grow the business.

- ◆ Responsible for company performance metrics to sustain/increase growth and profitability
- ◆ Work with the bank to secure capital and operating cash needs
- ◆ Coordinate with external auditors as well as perform internal financial reviews
- ◆ Assist with setting strategic goals for the company
- ◆ Provide support and training for a staff of approx. 30 direct and indirect employees
- ◆ Set internal control policies consistent with GAAP

SUPERIOR ESSEX, Fort Wayne, IN

2013 to 2014

Regional Controller working in partnership with Plant Managers to maximize profitability.

- ◆ Responsible for leading profitability through analysis for the Fort Wayne and Simcoe, ON plants
- ◆ Direct the annual budget process for the plants
- ◆ Maintain standard cost system with accounting managers
- ◆ Provide cash analysis on production items
- ◆ Provide forecasts and plans for the plants
- ◆ Accountable for quarterly plant review analysis
- ◆ Advise on development of staff and provide clear direction on goals/objectives

BRILJENT, LLC, Fort Wayne, IN

2008 to 2013

Controller for a diverse training and development firm.

- ◆ Assisted with implementation of new ERP system
- ◆ Responsible for all human resource and accounting audits including DCAA, CMS, BKD, Workers Compensation, Sales Tax, and DOL
- ◆ Treasury responsibilities included cash forecasts, bank financing and credit collections
- ◆ Successfully reduced audit time from 10 to 3 days
- ◆ Implemented a P-Card system reducing reconciliation time by 75% and improving internal controls
- ◆ Prepared financial statements for 3 other companies
- ◆ Assisted in bid proposals
- ◆ Responsible for weekly and monthly financial reporting

GENERAL ALUMINUM, Fremont, IN

2007 to 2008

Plant Controller for an automotive manufacturer that consisted of die cast and machining operations.

- ◆ Responsible for monthly and annual budgets and forecasts
- ◆ Stopped General Manager from understating scrap and showed him the value of a controller
- ◆ Maintained standard cost system
- ◆ Stopped vendor stealing from the company resulting in a \$7,000 per month savings
- ◆ Resolved various inefficiencies in the plant resulting in approximately \$3,000 savings per month
- ◆ Started posting efficiencies by shift for better communication with employees

STEEL DYNAMICS, INC., Fort Wayne, IN

2004 to 2006

New Millennium Building Systems, Inc., Florence, SC

Plant Controller for a world class joist manufacturer.

- ◆ Complete financial responsibility for the plant
- ◆ Tracked all jobs on a percentage of completion basis
- ◆ Prepared monthly projections and the annual budget
- ◆ Converted DOS based ERP system to Windows
- ◆ Responsible for monthly physical inventories
- ◆ Supervised a staff of five including the collections department

Steel Dynamics, Inc., Columbia City, IN

Accounting Supervisor for a world class structural beam manufacturer. Was promoted to Plant Controller for New Millennium Building Systems, Inc. within 2 years.

- ◆ Prepared division financial statements
- ◆ Supervised payroll and scrap accountants
- ◆ Responsible for bank reconciliations
- ◆ Assisted in quarterly inventories
- ◆ Projects as requested

AUBURN FOUNDRY, INC., Auburn, IN

1997 to 2004

Plant Controller, Staff / Plant Accountant for a grey iron foundry. Worked with General Motors, Eaton, Whirlpool and various other customers.

- ◆ Full general ledger responsibilities
- ◆ Oversaw multi-million dollar physical inventories at two plants
- ◆ Led the accounting department through the bankruptcy
- ◆ Projects as needed
- ◆ Responsible for all accounts receivable collections
- ◆ Lead for financial audits
- ◆ Supervised a staff of nine

LEONARD J. ANDORFER & CO., Fort Wayne, IN

1995 to 1997

Staff Accountant for a small public accounting firm.

- ◆ Assisted in various audits including several REMC's and private companies
- ◆ Prepared all property tax returns for the firm
- ◆ Compiled client financial statements
- ◆ Prepared payroll tax returns

CAROL S. FENTON, CPA, Peru, IN

1994 to 1995

Staff Accountant for a small public accounting firm.

- ◆ Two person team to prepare in excess of 400 individual tax returns
- ◆ Worked through purchasing another firm in the middle of tax season
- ◆ Compiled client financial statements
- ◆ Performed bank reconciliations

EDUCATION

Manchester College

Bachelor of Science in accounting, May 1994

ADVANCED CERTIFICATIONS

Certified Public Accountant, April 2003

COMPUTER SKILLS

MAS 200 G/L, AS 400, Epicor G/L, Microsoft Great Plains G/L, ADP Payroll, Trupay Payroll, Ultipro Payroll, Crystal Reports, Microsoft Office Suite, Microsoft Budgeting, Depreciation and FrX Reporting Software

Seeking a role which allows me to explore the analyze financial data in order to articulate customer needs. My goal is to be a part of a team based organization which allows me to navigate through different functions using my knowledge of finance and accounting, analytical strengths and past experience to identify and define the solutions that will maximize the value delivered by the organization to its stakeholders.

EDUCATION

Saint Mary's College, Notre Dame, Indiana
Bachelor of Business Administration, May 2014
Concentrations: International Business and Finance

Honors: Dean's Scholarship, Haggar Family Scholarship, Saint Mary's Varsity Letter, selected to attend NCORE, The Sr. Christine Healy, CSC Award for Service, SIMS ALLY Award, Frank A. Yeandel Business Award, Achievement Award in International Business

Multilingual: English (fluent), Spanish (fluent), Italian (proficient)

EXPERIENCE

GT Independence, LLC Sturgis, Michigan
Business Manager- Tax Department

December 2014 - Present

- Provide innovative tax planning and review income tax returns for over 15,000 employers
- Deliver a full range of tax services in compliance with laws and regulations within timeframe for 7 different states
- Coordinate with the accounting staff to maintain tax balances on general ledger
- Build relationships and interact with state agencies to provide excellent planning, consulting and expertise
- Lead a Million-dollar project working closely with the Michigan Unemployment Insurance Agency
- Manage and lead tax department in all phases to prepare all tax papers in regular basis data requests
- Manage tax provision and tax compliance process
- Assist in W-2 processing for over 17,000 employees

GT Independence, LLC Sturgis, Michigan
Staff Accountant

October 2015- Present

- Process biweekly payroll for over 200 employees
- Reconcile bank accounts, and prepare related journal entries
- Prepares general ledger entries by maintaining records and files; reconciling accounts.
- Manage employee credit card applications and charges
- Review reconciliations to ensure that they are prepared properly and follow-up on any unusual items.
- Assist CFO with accounting, financial, or administrative tasks as necessary
- Analyze information and options by developing spreadsheet reports
- Assist with annual audit

Zoetis, Research and Development, Kalamazoo, Michigan

Project and Portfolio Management – Veterinary Medicine Research and Development (VMRD)

May 2014 - September 2014

- Interface with various parts of the business matrix (project management, project teams, functional lines)
- Portfolio level statistical modeling and recommended actions supporting the business operating plan
- Statistical Modeling recommendations for project schedule to best asses forecasted completion dates
- Software assessment on commercially available risk management products with evaluations provided to meet business needs
- Supported various continuous improvement projects using DMAIC/Lean Six-Sigma Methodology

Microsoft Office: Project, Outlook, Word, Excel, PowerPoint, Publisher, Access, Visio, OneNote

Others: ASPEN Systems & Software, Minitab Statistical Software, Palisade @Risk software, Deltek Acumen Fuse Software, Microsoft Dynamics GP

INVOLVEMENT and VOLUNTEER ACTIVITIES

- Habitat for Humanity
- Director and Coach Youth Soccer League (K-6)

Julie Beal

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Objective

To obtain a full time position that will enable me to use my strong organizational skills, love of numbers, attention to detail as well as my versatile business skills in a positive working environment.

Professional Experience

GT Independence, Sturgis, Michigan – *Billing Manager* (6/2017 to Current)

- Responsible for leading and planning the billing operations for 20 person department.
- Create and monitor billing procedures and collect all accounts receivable for approximately \$75M annually.
- Design and implement policies and procedures as well as streamline effective billing processes across multiple agencies.
- Prepare numerous month-end closing and accounting reports.

Billing Team Leader/Manager in Training (1/2017 to 6/2017)

- Coordinate billing procedures for 4 person team.
- Responsible for all contractual provisions with each agency regarding the submission of billing data.
- Prepare advance reconciliations and apply payments to the general ledger.
- Assist Billing Manager and Controller with administrative accounting tasks.

Colon Community Schools, Colon, Michigan - *Data/Technology Specialist* (8/2015 to 6/2017)

- Responsible for implementing new technology and software to teaching staff.
- Monitor and update district IPADS and Chromebooks.
- Handle all social media communication.
- Design and implement district wide marketing and public relations activities including mailings, school newsletter and general community relations.

Progressive Residential Services, Battle Creek, Michigan - *Fiscal & Billing Specialist* (4/2014 to 8/2015)

- Responsible for billing and collecting \$2.5 million dollars annually through Summit Pointe Provider Access and successfully collected \$500K in bad debt during 2014 fiscal year.
- Monitor contract addendums and per diem rates to ensure profitability as well as treatment plans for clients.
- Serve as Representative Payee and reconcile accounts for over 30 clients.
- Maintain and reconcile petty cash for office.

Lutheran Social Services of Michigan, Battle Creek, Michigan - *HR/Fiscal & Data Specialist* (10/2013 to 4/2014)

- Execute accounting and statistical reporting procedures including Payroll, Accounts Payable, Accounts Receivable and Insurance billing through Summit Pointe Provider Access system.
- Maintain accurate fiscal records for assigned programs.
- Disseminate information relevant to client records, employee records, and program services.
- Prepare and process documents for recruitment, new hires, and terminations.
- Coordinate all employee training requirements as well as general human resource needs such as FMLA, Benefit Administration and general day-to-day requirements
- Identify, document, and resolve all discrepancies between program records and funding source records from Summit Pointe.
- Monitor contracts and payment authorizations from funding sources; maintain accuracy of all financial records, reports and billings as well as reconcile payment ledger against rate schedule, generate over-/under-payment reports and track receivables.

Office Manager/Coordinator (04/2013 – 10/2013)

- Coordinate office related services and procedures for assigned center or programs
- Supervise clerical staff.
- Provide reception services including answering phones, greeting clients and guests and maintenance of staff schedules.

Athens Area Schools, Athens, Michigan - Para-Professional for Special Education (10/2011 to 4/2013)

- Help to provide instructional opportunities that would otherwise be difficult to provide in the classroom by delivering quality services to students with disabilities.
- Serve as part of the educational team and help to carry out individual goals as outlined in education plans by performing daily activities using specific materials and methods or modifications.
- Work one-on-one or in small groups as well as supervise children in hallway, lunchroom and playground.

Pro Services, Inc., Portage, Michigan - Administrative Services (8/2009 to 10/2011)

- Assigned various administrative duties for multi-skilled trades company.
- Executive Assistant to the CEO - provide high-level clerical, administrative and project-based support to the CEO including scheduling travel, arranging meetings, handling information requests, preparing reports/presentations, correspondence, liaising with customers and personal finance assistance.
- Accounts Payable - Receive and review vendor invoices, code invoices for payment, assemble AP packages for approval by appropriate managers, process checks to send to vendors and field incoming calls vendor inquiries.
- Payroll Administration - Perform all activities necessary to process multiple payrolls including maintaining related records, processing involuntary deductions such as levies and garnishments, preparing accounting transactions, documenting and updating employee information, and preparing special reports for management. Served as lead Payroll Administrator during 3-month maternity leave and then back-up as needed.
- Human Resources - Responsible for assisting with recruiting and staffing, employee orientation and development, employee relations, maintaining employee files and assisting with day-to-day HR projects.
- Benefit Administration - Assisted with compensation, benefits administration and recordkeeping.

Litchfield Landscape Elements, Litchfield, Michigan - Marketing Manager (10/2007 to 8/2009)

- Responsible for marketing, sales administration and estimating to leading site furnishing company.
- Review and calculate product pricing and margins.
- Prepare and analyze client quotes.

Julie's Cuddle Cubs Day Care & Pre-School, Colon, Michigan - Licensed Day Care Provider (8/2002 to 10/2007)

- Responsible for all aspects of day care and pre-school.
- State of Michigan Group Home License.

Education

Ferris State University, Big Rapids, MI

Bachelor of Science – Marketing/Sales, 1993, Major – Marketing/Sales, Minor - Communications

Associates of Applied Science, 1992

Glen Oaks Community College, Centerville, MI

Accounting Certificate

Sturgis High School Graduate, 1989

Megan Stringham

60611 Middle Colon Rd – Burr Oak, MI 49030

269-806-5973

mestringham@gmail.com

*I strive to contribute my skills and energy to support a growth inspired environment.
I possess a strong and intuitive drive for excellence while being an enthusiastic contributor.
I am extremely creative and sharp in my ability to anticipate the needs of a department and its staff to
maximize productivity and to meet essential goals and deadlines.*

AREAS OF SPECIALTY & SPECIAL INTEREST

- Four Year Proficiency in Spanish
- Social Psychology
- Social Development
- Health Psychology
- Psychopathology of Childhood and Adolescence

EDUCATION

Bachelor of Arts in Psychology August 2004 – May 2009
University of Michigan, Ann Arbor, Michigan

Diploma with Highest Honors August 1999-May 2004
Portage Northern High School, Portage, Michigan

PROFESSIONAL EXPERIENCE

GT Independence/Michigan Agency with Choice August 2011 – Present
Sturgis, Michigan

Operational Unit Manager April 2016 –Present

Supervise all Operations Staff for Michigan, ensure all deadlines are met, complete business development for newly acquired contracts, monitor workload of staff to ensure a proper distribution of tasks, prepare reports, monitor weekly metrics, create and maintain operational objectives, and build relationships with agency personnel to ensure satisfaction.

Customer Service Manager August 2015-April 2016

Supervise 50 Customer Service Associates and 3 Team Leaders, complete annual performance reviews, coach and mentor team leaders, train new staff and administer subsequent trainings of existing staff.

Michigan Team Leader September 2014-August 2015

Supervise 22 Michigan Customer Service Associates. Deescalate upset Customers, promote intradepartmental collaboration, interview all interested applicants, properly discipline staff in accordance with company policy, and coach/mentor Customer Service Associates.

Assistant Director of Customer Relations August 2014-September 2014

Field and resolve escalated callers to ensure the highest level of customer service to a diverse population of clientele and agency personnel. Participate in contracted agency conference calls and meetings to discuss updates or concerns. Investigate customer service grievances. Generate and analyze performance data of Customer Service Department staff and formulate plans for improvement regarding data obtained. Assist Director of Customer Relations in all tasks assigned.

Megan Stringham

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PROFESSIONAL EXPERIENCE – (Continued)***Interim Corporate Compliance Manager***

July 2014- August 2014

Handle all the tasks of the Corporate Compliance Associate while reporting to the CEO, COO and CFO and managing the team of Corporate Compliance Associates. Complete agency contract applications for new business and expansion of the company. Prepare files, updated policies, and readiness review for yearly auditing by 50+ different Governmental Agencies. Respond to quandaries of auditors while on site and gather additional materials requested. Develop Corrective Action Plans in response to audit findings and carryout the plan of correction in its entirety including all follow-up needed.

Corporate Compliance Associate

November 2013-July 2014

Accountable for all areas of contract management including renewals and ensuring company's compliance to uphold the requirements. Ensure compliance with HIPAA laws and requirements including receiving and investigating violations, creating updated in-service staff training and internal risk analysis. Assist in ensuring continuous CARF accreditation compliance by writing, reviewing and updating policies & procedures, heading the formal grievance and complaint processes and investigations. Website management, social media updates and annual agency surveying and result analysis.

Supported Employment Team Leader

September 2012-November 2013

Maintained client caseload while supervising a team of Supported Employment Specialists ensuring all work was completed and supplying problem resolution assistance to Specialists. Completed billing and progress reporting to referring agencies. Assisted with preparation for CARF Accreditation survey.

Supported Employment Specialist

August 2012-September 2012

Assessed client barriers to promote employment and life skills goals. Assisted an extremely diverse population of clients in employment efforts, completed forms and reporting wages to government agencies. Collaborated with the Government Agency referring staff on client status and progress.

Administrative Assistant

August 2011-August 2012

Provided administrative skills for a professional program providing care and mentorship in-home and in the community for individuals with developmental disabilities and mental illness. Maintained all office correspondence, files and client scheduling while complying with confidentiality policies and HIPAA. Planning, coordinating and directing client socialization program. Assisted a diverse population of customers and vendors in all inquiries and problem resolutions.

ADAPT

August 2010-August 2011

Sturgis, Michigan

Residential Aid

Supervision of adult foster care clients with developmental disabilities and mental illness. Personal care, toiletry, cleaning, and cooking support for clients. Professional communication with physicians, supervisors, ancillary staff, and guardians. Provided excellent 12-hour shift care.

Megan Stringham
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LS&A Central Files – University of Michigan
Ann Arbor, Michigan

January 2005-March 2008

File Clerk

Created student files. Handled complex and confidential materials. Managed incoming and outgoing calls. Assistant to office personnel. Assisted in paper to electronic file conversion process.

ADDITIONAL TRAINING & CERTIFICATION

Assertiveness Training for Women in Business 2016 – Chicago, Illinois
American Management Association

A Comprehensive Guide to HIPAA Compliance: 2014 – Grand Rapids, Michigan
Medical Law, Mega Rule, and State Law Training

Assertive Leadership Skills Training for Managers and Supervisors 2013 – Sturgis, Michigan

Kalamazoo Valley Community College 2010-2011 – Kalamazoo, Michigan
Post-Baccalaureate Pre-Medical Courses

Proficient in Microsoft Programs with 13 years of experience

REFERENCES AVAILABLE UPON REQUEST

Patrick Hoelscher

66740 Old Barn Rd. – Sturgis, MI 49091

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Information Technology Management

A highly experienced IT leader with very strong technical skills. Experience leading organizations in multiple industries as a member of the executive management team. Ability to architect and implement global systems to greatly improve operations, customer service and business intelligence. Experience leading project teams that include employees from many different departments. Passionate about technology and staying current to bring fresh ideas to the organization. Thorough cost, benefit and risk analysis of cutting-edge technology as it applies to the organization. Experienced leader that performs well under pressure. Effectively communicates technical matters to non-technical peers.

Education

Information Systems – IT Management, Master of Science

DePaul University, Chicago, IL

Studies focused in Information Technology management, Project Management, Network Security and Database Design.

Computer Science, Bachelor of Science

2005

Trine University, Angola, Indiana

Studies focused in Networking, Database Design, Application Development, Computer Architecture, Electrical Engineering, and Management Information Systems.

Experience

Information Technology Director

2016 – Present

GT Independence, Sturgis, Michigan

Executive management team member. Provide strategic direction for the IT infrastructure and development of business systems. Lead continuous improvement projects to improve and secure all systems. Work with other leaders in the organization to solve complex problems related to our financial services. Coach and mentor others in the department.

Information Technology Director

2008 – 2016

Burr Oak Tool Inc., Sturgis, Michigan

Executive management team member. Provide strategic IT direction for the company. Manage and coach IT staff. Develop capital expenditure budget and negotiate contracts. Lead the implementation of Microsoft Dynamics AX 2012 R3 and Microsoft Dynamics CRM 2011. Plan and implement CMMS and other technologies for preventative maintenance and lean efforts. Reduce helpdesk calls by implementing an IT ticketing system and gathering important ticket data. Use SSRS and other business intelligence tools to report and provide valuable data and

forecasts to management. Architect disaster recovery plans with Hyper-V, VMware, Veeam, Netapp, EqualLogic and mirroring data to other sites. Designed and implemented multisite international networks using routers, switches, wireless controllers, internet proxies and caching. Secured networks with firewalls, access control lists, encryption, authentication, intrusion detection and endpoint security. Spectrum analysis and voice-grade wireless network design. Designed international site-to-site VPN solutions and remote access to applications. SQL Server 2012 performance optimization.

Systems Administrator

2007 – 2008

Burr Oak Tool Inc., Sturgis, Michigan

Setup and implemented Microsoft Project Server including Project Web Access (PWA). Developed many customized SSRS for Microsoft Project Server. Upgrades of ERP systems, CRM, email servers and many others. Responsible for network design and security. Developed custom applications and interfaces using .NET and database skills. Developed many reports and dashboards using business intelligence tools and SQL. Designed voice, data and storage networks using VLANS, advanced routing, link aggregation and jumbo frames. Implemented a global Windows domain, DHCP, Active Directory, DNS and PKI.

Information Technology Manager

2005 – 2007

Owens Products, Sturgis, Michigan

Provide strategic design of manufacturing and retail information systems. Developed VB.NET applications to interface SYSPRO ERP with other systems. Developed complicated reports from multiple data sources for management. Administer servers, workstations and all network devices. Create network and workstation policies. Train end users on LOB applications. Work with vendors on website development.

Information Technology Consultant

2006 – 2008

Hoelscher IT Solutions, Sturgis, Michigan

Provided SYSPRO ERP consulting to remote and local businesses. Designed Active Directory and server infrastructure. Networked different sites together with VPN, wireless technologies and mobile access. Installed and upgraded Microsoft Exchange mail servers. Built high performance servers and workstations.

Website / Database Programmer

2004 – 2005

Owens Products, Sturgis, Michigan

Developed retail websites for automotive accessories. Designed databases and interfaced with applications and websites. Created a custom “where to buy” application that provided real-time vendor locations. Optimized websites for popular search engines.

Certifications

MCSE – Microsoft Certified Systems Engineer

MCSA – Microsoft Certified Systems Administrator

MCTS – Microsoft Certified Technology Specialist Exchange

Volunteer

Holy Angels Catholic Church – Provide consulting and support for all Information Systems.

Christopher Taylor
 1017 Lauri Ln, Sturgis, MI 49091
 (248) 565-7544 - ctaylor883@gmail.com

Experience

- GT Independence** Sturgis, MI
November 2014 - Current
Director of Quality and Compliance
- Direct all compliance functions for a Medicaid Fiscal Intermediary with over 30% consistent annual growth
 - Management of over 100 customer contracts
 - Provide legal and risk counseling on business and regulatory matters
 - Engage in strategic planning as a member of the executive team
 - Contract drafting, negotiating, and review
 - Management of 30+ annual customer audits
 - Resolution of legal issues in collaboration with outside counsel
 - Achieved CARF accreditation and consistently maintain standards
 - Developed and manage internal auditing function
 - Manage compliance department which includes 7 staff
 - Developed and manage Data Integrity function
 - Perform legal research as needed
- Strategic Staffing Solutions** Detroit, MI
November 2011 - November 2014
Staff Attorney
- Contract review, drafting, and negotiation in matters relating to a Fortune 500 customer base and a large supplier base
 - Supply chain management of a large subcontractor base in a fast paced environment
 - Management of immigration program in conjunction with outside counsel
 - State filing and business license management for nationwide branches
 - Legal and risk counseling for an international company
 - Supervisory role in the legal/compliance team
 - Legal training and CCWP certification training for customers and internal clients
 - Management of lease portfolio for national branches
 - Project planning, organization, and teamwork are crucial to this position
- Sielatycki Law Firm** Kalamazoo, MI
April 2010 - November 2011
Associate Counsel
- Representation and counseling on business and real estate matters from initial consultation through trial
 - Ownership of a case load with direct client interaction
 - Substantial commercial litigation primarily involving contract law
 - Legal writing and drafting of letters and court documents through trial
 - Courtroom experience as a litigator
 - Legal research primarily in contract and real estate law
- State Administrative Office of Hearings and Rules** Lansing, MI
Law Clerk
- Legal research for Administrative Law Judge Andre Friedlis
 - Performed critical analysis on and edited court opinions
 - Reviewed and digested MIOSHA citation appeals from years 2000 to 2007 for the MIOSHA Digest
- Legal Services of South Central Michigan** Lansing, MI
Extern
- Consulted with attorneys and clients directly on a number of legal matters such as foreclosure, divorce, custody, landlord and tenant law, bankruptcy, and state benefits
 - Worked with legal databases and drafted court documents

MSU College of Law Small Business & Nonprofit Clinic
Clinician

East Lansing, MI

- Worked with small business and nonprofit owners directly on legal issues
- Legal research in business, nonprofit, contract, and other business related issues

Education

Michigan State University College of Law

East Lansing, MI

Juris Doctor - Cum Laude (2009)

- Merit Scholarship Recipient
- Managing Editor of Business – “Journal of Business and Securities Law”
- Vice President of Communications – Business Law Society

Hillsdale College

Hillsdale, MI

Bachelor’s Degree in Economics, Minor in Spanish - Summa Cum Laude (2006)

Bar Membership

Admitted to Michigan State Bar, November 2009 (P73269)

Activities

Volunteer: Detroit After-School Program, Habitat for Humanity, SPCA of SW Michigan

Interests: Jogging with my dog, Tennis, Hiking, Outdoor Activities

Adam Kujacznski
akujacznski@gtindependence.com - 269.221.6272

EXPERIENCE

DIRECTOR OF MARKETING

GT Independence; Sturgis, MI

March 2014-Present

Responsible for the development and implementation of the company's strategic and marketing plans including management of all outbound and internal marketing efforts. Execution of all advertising, copy development and promotional activities of the company in relation to stakeholders, and development of appropriate metrics to determine the overall effectiveness of the marketing plan.

Responsibilities and Duties Include:

- Direct management of company's online presences and strategy.
- Write all company proposals in response to government RFPs.
- Develop overall company communication strategy.
- Develop and implement company marketing plan in conjunction with senior management.
- Analyze market trends and recommend changes to marketing and business development strategies.
- Develop and execute social media and content marketing plans.
- Manage software innovation from conceptualization through development and launch.
- Develop all company collateral including design and copywriting.
- Manage company public relations including customer surveys and press releases.

FREELANCE MARKETER

Briarpatch Marketing Group; Three Rivers, MI

2009-2014

Through Briarpatch Marketing Group I worked to create and implement marketing solutions for businesses, from local mom and pop shops to international companies. I specialized in cost effective internet marketing to drives sales and awareness for companies.

Responsibilities and Duties:

- Marketing and advertising consultation for small businesses to national companies.
- Design and code email marketing campaigns and strategies.
- Design and execute social media marketing plans.
- Draft and distribute press releases.
- Copy writing, editing and content writing for varied products and services.
- Website design and optimization.
- Design and execute SEO and SEM plans.

Adam Kujacznski

akujacznski@gtindependence.com - 269.221.6272

DIRECTOR OF E-MARKETING AND ECOMMERCE

Condo.com; Miami, FL

2006-2009

Responsible for creating, implementing and managing all email marketing, site communication and database growth initiatives at Condo.com. Also charged with managing eCommerce products and process design to drive on-site company revenues. I was directly responsible for growing the company's email marketing program from 5000 subscribers to over 100,000 double opted-in subscribers and driving over 30,000 unique users to the website each month.

Responsibilities and Duties:

- Perform all functions required to operate an email marketing program sending over 250,000 emails monthly.
- Design email marketing and ad creative.
- Manage website usability and user interface design.
- Develop and execute social media marketing.
- Identify and manage purchasing of all advertising.
- Write and edit industry white papers.
- Manage external employees and cross department projects.
- Organize and oversee all public company appearances and trade shows including materials, logistics and booth design.

EDUCATION

MICHIGAN STATE UNIVERSITY

East Lansing, MI — Bachelor's Degree, 2005

SPECIALTIES

Email marketing, social media marketing, social media optimization, market research and discovery, directing marketing initiatives, public relations, press release writing, new product design, website content/ copy management, video filming and editing, formal proposal drafting, email design, ad copywriting and design, eCommerce process design, website usability, Google Adwords and Analytics, Radio and Print advertising and gorilla marketing.

ROBERT R. LEWIS

2948 Carsten Avenue Kalamazoo, MI 49004 (269)569-2332 roblewis1022@hotmail.com

PROFESSIONAL STRENGTHS

- Goal oriented leader
- Customer focused
- Relationship and sales driven
- Motivator/mentor/team builder
- Networking expertise
- Lobbying experience
- Persuasive communicator
- Technology proficient
- Marketing skills
- Business management acumen

EXPERIENCE

GT Independence, Sturgis, MI-August 2009-Present

FIELD SERVICE MANAGER

- Increased revenue by 75% in last two years
- Developed current salary and commission structure for field representatives
- Build and maintain relations with over 30 agencies
- Recruit/train/manage four field representatives
- Review and monitor agency contracts
- Promoted to manager after one year of exceptional service
- Form and implement actions plans for individual agencies
- Attend state legislative meetings to represent GT Independence and our clients
- Coordinate and present quarterly staff meeting
- Resolve conflicts and issues

Next Door Operations, Mt. Pleasant, MI ó May 2006-August 2009

STORE MANAGER

- Recruited and terminated in-store personnel
- Maintained quality assurance of perishable and non perishable items
- Facilitated orientation and training
- Provided counseling/coaching responsibilities
- Projected monthly and annual budgets
- Administered daily inventory control and monthly audits
- Communicated with vendors to order products
- Prepared weekly employee work schedule and payroll
- Assured staff compliance with rules and regulations of alcohol and tobacco sales
- Attained top recognition for "White Glove" inspection for two consecutive years

Target Corporation, Ann Arbor, MI 6 September 2003-May 2006

EXECUTIVE TEAM LEADER –LOGISTICS/HARDLINES

- Trained new employees with tools for success
- Used proper tactics to drive sales and increase profitability
- Oversaw guest service and merchandising of five departments with sales ranging from 15 to 20 million dollars annually
- Provided floor leadership during hours of operation, as well as opening and closing the store
- Established excellent rapport with guests and team members
- Supervised the facility and scheduled staff
- Maintained quality performance objectives and assisted in cost control programs
- Received recognition for transitioning the 60 member Flow Team from third to first shift
- Developed space management protocol for stockroom

EDUCATION

Central Michigan University, Mount Pleasant, MI

Bachelor of Science in Business Administration, December 2003

Majors: Marketing, Logistics Management

REFERENCES

Professional references provided upon request

13301 SW 9th Place Davie, FL. 33325•954-612-2977•pjgallo@live.com

Juan Gallo

About me

A motivated bilingual individual with over ten years experience in sales, customer service, management training and marketing. Currently studying towards a Master's in Counseling and Psychology.

Experience

2013-Present GT Independence Davie, FL.

Florida State Director

- Helping dual enrollment Medicare/Medicaid participants by walking them through fiduciary long term care.
- Exclusively working with Humana Medicaid state wide. Maintain and direct all 600 case managers that report to me for the PDO program.
- Supervise and help manage all internal Florida reps by maintaining vendor reports and contract guidelines from the ACHA and Humana.
- Coordinating and participating in promotional activities and trade shows, to educate and market our product.
- Responsible to work from home as well as traveling back and forth to the home office in Michigan.
- Train all field Case Manager's 3- 4 times a year individually and in group throughout the State of Florida in regards to Self Direction and Medicaid Waiver program.
- Create and develop all marketing material, newsletters and contracting verbiage for new business.
- Find new business opportunities and successfully bring them to a contractual working relationship.

01/2012-03/2013 A1 Medical Imagine Aventura, FL.

Senior Account Executive

- Coordinating and participating in promotional activities and trade shows, to educate and market our product.
- Managing the development and distribution of sales and marketing materials.
- Achieving assigned sales goals by identifying and closing new business development deals and securing existing contract renewals.

01/2011-12/2011 The Good News Ft. Lauderdale, FL.

Regional Sales Manager

- Develop and plan sales strategy for a niche market that ensured attainment of company sales goals and profitability.
- Recruit, test, hire and train outside commissioned account executives.
- Responsible for the performance and development of the account executives.

954-612-2977•pjgallo@live.com

Juan Gallo

- Maintained client accounts during the sales process for long term retention.

05/2009-12-2010

DeVry University

Miramar, Fl.

Enrollment Counselor

- Enroll new students into degree/career plan.
- Present interviews to prospective high school students who are looking to further education.
- Continue to service students after their first start date by follow-up and continuing education on scholarship and new degree plans.
- Receiving lead through the Internet. Calling leads and educating them their options earning an undergraduate degree at DeVry University.

Education

08/2004-08/2006

Palm Beach Atlantic Univ.

West Palm Beach, Fl.

A.A.

Urban Ministry

08/20011-08/2014

Trinity International Univ.

Davie, Fl.

B.A.

Ministry with Minor in Psychology

Currently finishing my Master's in Counseling and Psychology.

References

1. Nohora Nunez (Personal Reference) 1-786-515-3078
2. Victoria Vincent (Business Reference) 954-649-2828
3. Ana Longa (Employee Reference) 786-317-6588

Person Receiving Services Feedback Committee

Purpose

The Person Receiving Services Feedback Committee will provide insight to GT Independence in regards to services and new initiatives. For example, our Person Receiving Services Feedback Committee members may provide us with new ways to think about:

- Providing member education
- Providing member outreach
- Addressing members' needs
- Addressing service challenges
- Working with community partners

Meeting Frequency and Location

The Person Receiving Services Feedback Committee meets quarterly. All meetings are held via conference call and all members are asked to attend all meetings. We understand that this is not always possible. Please contact [contact person and information] if you cannot attend a meeting. Please also speak to [contact person] if you have ideas on how we can make it easier for you to attend and participate in meetings. Members who have more than 2 unexcused absences may be replaced by new members to allow the group to move forward.

Membership Terms and Positions

Members commit to a one-year or two-year term. We have a mix of new and experienced members so we can help each other learn. We seek members of different ages, disabilities, cultures, and geographic areas so we learn from these differences as well. Members can assume a leadership role as they gain more experience.

Meeting Accommodations

Members can get many kinds of help to support their involvement. Members should contact [contact name] to fill out the Accommodations Request Form if assistance is requested for their involvement.

Roles and Responsibilities

Members will allocate approximately 2 hours per month to do any of the following:

- Prepare for and attend Person Receiving Services Feedback Committee meetings
- Review materials shared, ask questions, and provide feedback
- Provide input based on personal experiences
- Report on any community events attended to better understand the needs of members and local communities

- Work with staff to find creative ways to understand the needs of other members
- Focus on solutions that benefit a wide range of members

Staff Roles and Responsibilities

Staff will provide Person Receiving Services Feedback Committee members with the following:

- Information on GT Independence self-directed services and Person Receiving Services Feedback Committee roles and responsibilities
- Notice of meetings at least one month prior to the meeting
- Agendas and meeting materials at least two weeks prior to the meeting by mail or email (method chosen by member)
- One-on-one opportunities to meet with staff, share ideas, and ask questions

Decision Making and Conflict Resolution

The Person Receiving Services Feedback Committee advises GT Independence by providing recommendations to improve GT Independence's practices and member benefits. Members will seek consensus before making recommendations. Person Receiving Services Feedback Committee Ground Rules will be used to ensure fair conversations.

Code of Conduct

Person Receiving Services Feedback Committee members are asked to respect the following Code of Conduct:

- Maintain the confidentiality of personal information shared in the meeting;
- All members will conduct themselves in a professional manner;
- Treat each other with dignity and respect;
- Avoid being aggressive when you disagree with a decision or a statement;
- Refrain from using profanity or any other derogatory terms;
- Work collaboratively with others to further GT Independence's mission;
- Do not make statements or assumptions based on race, ethnicity, gender, sexual orientation, gender identity, age, disability, or any other personal characteristic; and
- Disclose potential conflicts of interest, real or perceived, before participating in discussions or votes.

- I. PURPOSE: To establish policies and procedures to ensure that calls are responded to promptly.
- II. APPLICATION: All GT Independence Fiscal Intermediary Services program employees.
- III. REFERENCE: N/A
- IV. DEFINITIONS: N/A
- V.
- VI. POLICY: All Telephone calls relating to GT Independence will be responded to within 24 business hours.
- VII. PROCEDURE:
 - A. Customer Service Associates will be available to receive phone calls during standard business hours of 8am to 5pm Eastern Time, Monday through Friday.
 - B. Calls received will be tracked according to the procedures outlined in policy 6-22 Tracking Communications and Complaints.
 - C. Field Service Representatives will be provided with or maintain cell phones with voicemail and will return calls within 24 hours.
- VIII. REVIEW RESPONSIBILITY:
This policy and associated procedures shall be reviewed annually.



Community Living Services Inc.
642 E. Nine Mile Road
Ferndale, MI 48220
Phone: 248-547-2668

August 22, 2017

John Carmichael, CEO
GT Independence
215 Broadus St.
Sturgis, MI 49091

Dear Mr. Carmichael,

Thank you for the opportunity to offer this letter of recommendation for GT Independence.

As you know, GT Independence has worked in partnership with Community Living Services of Oakland County over the last eleven years to provide fiscal intermediary services for 1296 people who chose to self-direct their services. The consistent and steady growth of both of our organizations during each year of our partnership is clear evidence of the high quality services we are providing to people with disabilities in Oakland County, Michigan.

The front line staff at GT Independence have shown themselves to be professional, knowledgeable, and courteous to our staff, and more importantly, to the people we serve and their families. The staff's understanding of Self Determination is sound, and they routinely demonstrate a commitment to our mutual goal of providing self-directed supports that assist people in leading active, respected lives as valued members of their community.

We value the person-centered approaches GT Independence takes to assist those we serve in being successful in their roles as employers. We feel that the hands-on, in-person kick off meetings with individuals for the enrollment process is a key benefit of working with GT Independence. This is just one of the many ways that GT Independence goes up and beyond in their role as our fiscal intermediary.

GT Independence's leadership is very knowledgeable on tax, Department of Labor rules and regulations, and all aspects of fiscal intermediary services. Management staff are always available, prompt and quick to respond to any requests we may have.

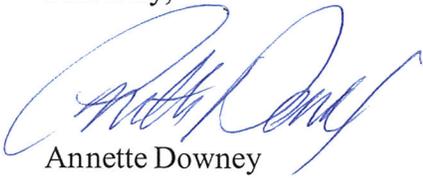
We know that GT Independence values us and everything we stand for, not just as a funding source, but also as a partner in our mutual quest to improve and empower the

lives of people with disabilities. Our joint commitment to “Self-Determination for ALL” is clearly demonstrated in our day to day interactions with GT Independence staff at all levels.

Despite having numerous options for fiscal intermediary service providers in Michigan, GT Independence has remained over the last eleven years, and continues to remain today, our top choice as a fiscal intermediary provider as the staff at GT Independence consistently demonstrate care, concern, and excellence in everything they do.

I can be reached at 248-547-2668, or at adowney@comlivserv.com, should more information be helpful.

Sincerely,



Annette Downey
Executive Director
Community Living Supports, Oakland County Division



August 28, 2017

To Whom it may concern:

GT Independence has been the Participant Directed Option provider for Humana's Medicaid Long Term Care program for the past four years. During this time, they have proven to be a knowledgeable, capable provider of these services.

The GT field staff and customer service department are extremely responsive to the members and the Humana Care Managers. They assist with member enrollment and ongoing support to established members using the Participated Directed Option for care.

Back office departments are also very efficient and supportive. Reports are received timely and direct service worker payroll function is performed extremely well with minimal issues.

The customer service surveys of the members and care managers consistently show high levels of satisfaction with GT Independence service.

Humana is preparing to respond to the Intent to Negotiate for the next 5 year Florida Long Term Care contract. To meet the Participant Directed Option program, GT Independence has been chosen to continue to provide these services for the next contract period.

It is a pleasure working with the GT staff. If I can answer any questions you might have, please feel free to call me.

Sincerely,

Edward Miller
Manager, LTSS Provider Relations and Contracting.
Humana, Long Term Care

3349 Church Street, Suite I
Stevens Point, WI 54481



Ph 715-345-5968
Fx 715-345-5725

June 12, 2017

Greetings!

I am writing to you in support of GT Independence and their work, determination, and collaborative offering as an organization. We have been partnering with GT Independence for nearly nine years; thus, can personally speak to the value of this partnership.

GT Independence has played a crucial role in supporting the continuation and growth of Self-Directed Supports to CCCW's membership. With more than half of our membership utilizing GT Independence as their fiscal provider, people are able to have more control over their budgets, supports and services needed, and more importantly, over their lives.

Something deserving of your attention is GT Independence's commitment to customer service. And, this commitment begins from the very start. Members are given the benefit of face-to-face enrollments to talk through the service model options, support in processing the paperwork, and the responsibilities of being an employer. This support continues throughout as an ally for fiscal management, active problem solving, and ongoing customer service engagement.

Partnership and willingness to sit around the table in the spirit of collaboration is a given when working with GT Independence. But most importantly, GT is willing to go above and beyond to support people to live a life of their choosing.

If you aim to work with a collaborative, committed, and supportive organization, I recommend you consider partnering with GT Independence. If I can answer any questions or provide additional information, please do not hesitate to contact me at 715-204-1760.

Sincerely,

Jill Flugaur
Provider Relations Contracting Manager
Community Care of Central Wisconsin

Regional Offices:

211 State Highway 64, Antigo, WI 54409

503 East Ives Street, Suite 320, Marshfield, WI 54449

1401A East Main Street, Merrill, WI 54452

1200 Lakeview Drive, Suite 100, Wausau, WI 54403

2821 8th Street South, Suite 12, Wisconsin Rapids, WI 54494

GT Independence

Table of Programs Served

State	Program	Waiver Type	Population	Delivery System	Participants Served	Achievements
Michigan	<i>Community Mental Health Services</i>	1915(b),(c) - concurrent	<i>Individuals with Developmental Disabilities, severe and persistent Mental Illness. children with serious emotional disturbance</i>	PIHP	2,296	Began 2004; introduced in-home enrollments, collaborated with State and advocacy community, drove sustained growth in self-direction for people with Developmental Disabilities in Michigan.
Michigan	<i>MI Choice Waiver Program</i>	1915(b),(c) – concurrent	<i>Elderly and physically disabled adults who meet nursing facility level of care requirements.</i>	PAHP	1,532	Began 2006, enrolled 1 st self-directed program participant; conducted extensive training and outreach with MI Choice Waiver agents.
Michigan	<i>MI Health Link</i>	1915(b),(c) – concurrent	<i>Elderly and disabled who are Dually Eligible (Medicare and Medicaid)</i>	MCO	1,733	<i>Began in 2015, enrolled first Mich. Duals, quickly transitioned MI Health Link Members to GT, developed relationships with Aetna, Molina, Amerihealth, HAP, Meridian</i>
Wisconsin	<i>Family Care</i>	1915(b),(c) – concurrent	<i>Elderly, Physically Disabled, Intellectually Disabled adults</i>	PIHP	2,654	<i>Began in 2009, entered market with established FMS providers and became largest Family Care provider.</i>
Wisconsin	<i>IRIS</i>	1915(c)	<i>Elderly, Physically Disabled, Intellectually Disabled Adults</i>	<i>Fee-for-Service</i>	567	<i>Began in June 2016, second FMS provider added to IRIS, established regional office with dedicated staff.</i>
North Carolina	<i>CAP-Choice</i>	1915(c)	<i>Elderly, Physically Disabled, Intellectually Disabled Adults</i>	<i>Fee-for-Service</i>	2,020	<i>Began in 2010, contracted with State as sole provider, grew program from 12 participants, developed connections with care advisors from 99 county lead agencies</i>

State	Program	Waiver Type	Population	Delivery System	Participants Served	Achievements
North Carolina	CAP-C	1915(c)	Medically Fragile Children	Fee-for-Service	26	Pilot in 2016, State is currently rolling out statewide, GT collaborates with State officials to perform outreach to lead agencies and families
North Carolina	Innovations	1915(b),(c)	Individuals who meet ICF-IID eligibility criteria	PIHP	181	Extensive Supports Broker Requirements, Brokers do 3 months training, 3 months follow along, help access community resources, help participants manage budget authority model, extensive documentation and compliance support required
Maine	Consumer Directed Personal Assistance Services	1915(c)	Elderly, Physically Disabled Adults	Fee-for-Service	351	Successfully Transitioned from 3 Incumbent Vendors (including PPL); Raised overall satisfaction by 15% after the first year.
Maine	Elderly and Adults with Disabilities Waiver	1915(c)	Elderly, Physically Disabled Adults	Fee-for-Service	181	--
Florida	MLTSS Program	1115, 1915(b),(c)	Elderly and Disabled Adults	MCO	955	Began in 2013, helped Humana get approval to begin Participant Direction in Miami area, expanded statewide in 2016, 100% satisfaction rate
Colorado	VD-HCBS	n/a	Elderly and Disabled Veterans	Fee-for-service	47	Began in 2016, helped AAA get program approval with VA Hospital, completed readiness review
Minnesota	Consumer Support Grant and Community First Services and Supports	1115, 1915(i), 1915(k)	Elderly and Disabled Individuals	MCO	--	State waiting for waiver approval. Plan to begin services in 2017. Submitted successful proposal in 2016.
Illinois	VD-HCBS	n/a	Elderly and Disabled Veterans	Fee-for-service	45	Transitioned from St. Louis area provider. Contracted with AAA's in Illinois and Missouri
Missouri	VD-HCBS	n/a	Elderly and Disabled Veterans	Fee-for-service	173	Developed Customized reporting for VD-HCBS program, collaborated with Federal consultants to provide feedback on implementation items.



GT Independence

JOB DESCRIPTION

IDENTIFICATION

Job Title: Operations Team Leader
Supervisor: Operational Unit Manager
Effective Date: February 21, 2017

SUMMARY

General Description:

The team leader position is responsible for providing quality and efficient service to customers through the daily management of a team of employees to include motivating, recognizing and rewarding, coaching, counseling, training, and problem solving.

Responsibilities and Duties:

- Provides daily direction and communication to employees so that calls are answered in a timely, efficient and knowledgeable manner
- Provides continual evaluation of processes and procedures; responsible for suggesting methods to improve area operations, efficiency and service to both internal and external customers
- Managing employees, ensuring work is handled efficiently and effectively
- Provides performance feedback and coaching on a regular basis to each team member
- Ensures employees have appropriate training and other resources to perform their jobs
- Creates and maintains a high-quality work environment
- Assists the manager with the development, analyses and implementation of staffing, training, scheduling and reward/recognition programs
- Works as a member/leader of special or ongoing projects that are important to area/process improvement
- Uses appropriate judgment in upward communication regarding department or employee concerns
- Upholds the Company's Mission and Values
- Other duties as assigned by supervisor

The above statements are intended to describe the general nature and level of work being performed by people assigned this title. They are not to be construed as an exhaustive list of all job duties performed by personnel so classified. They are not intended to limit or in any way modify the right of supervisors to assign, direct, and control the work of employees under their supervision.



GT Independence
215 Broadus Sturgis, MI 49091
877.659.4500 www.gtindependence.com
Your life. Your choice.

EMPLOYMENT STANDARDS

General Education: High School Diploma or GED equivalent required; Associate Degree or two years of applicable experience preferred

Skills and Abilities:

- Writing and communication
- Critical thinking and problem solving
- Planning and organizing
- Time management skills
- Strong ability to participate in a highly effective team
- Personal computer skills
- Experience with Microsoft Office products

Work Environment: Work is performed in a typical office setting.

CONDITIONS OF EMPLOYMENT

GT Independence does not enter into contracts with employees for any specific length of time. Instead, employees are considered to be at-will employees under Michigan Law. This means that either you or the Company can terminate the employment relationship, with or without a good reason, at any time. Except in cases of misconduct or unsatisfactory work performance, the Company would certainly attempt to give as much notice as is practical under the circumstances if it intended to terminate your employment. In turn we ask for the same courtesy from you, which would generally be two weeks notice for most employees. Supervisors would be expected to give about four weeks advance notice in order to allow for a smooth transition.

No employee, supervisor, or other person has the authority to enter into an employment agreement with you for any specific length of time, or under any particular conditions, or to make any agreement contrary to the terms expressed in these employment policies. The only exception is the Chief Executive Officer, and would have to be in writing signed by the CEO.



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GT Independence

JOB DESCRIPTION

IDENTIFICATION

Job Title: Customer Service Associate
Supervision Received: Operations Team Leader, Operations Manager
Effective Date: 01/01/2011; Rev. 10/3/2016

SUMMARY

General Description:

The Customer Service Associate is a responsible for providing customer service to all GT Independence stakeholders including consumers, their employees and agency personnel. The Customer Service Associate anticipates and resolves customer issues.

Responsibilities and Duties:

- Communicate with consumers, employees and the agencies with which GT Independence holds a contract.
- Update records continually as new information is received from agencies, clients and employees
- Create budgets for clients
- Handle customer service requests, via phone, email, and fax
- Identify opportunities to improve our processes
- Resolve document deficiencies with customers
- Enter authorization data
- Review and approve needed reports such as overlap, overtime and variance
- Maintain confidentiality of records relating to clients
- Collaborate with other staff members to optimize delivery of services
- Uphold company values and mission
- Other duties as assigned

The above statements are intended to describe the general nature and level of work being performed by people assigned this title. They are not to be construed as an exhaustive list of all job duties performed by personnel so classified. They are not intended to limit or in any way modify the right of supervisors to assign, direct, and control the work of employees under their supervision.



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EMPLOYMENT STANDARDS

General Education: High School diploma or GED required. Associate Degree in business, human services or related field, or equivalent experience preferred.

Job-Related Experience: 1 year of experience relevant to the work performed

Knowledge: Knowledge of principles and processes for providing customer service. Knowledge of administrative and clerical procedures and systems such as word processing, managing files and records, designing forms, and other office procedures and terminology.

Skills: Personal computer skills; writing and communication skills. Experience with Microsoft Office products is necessary; including Microsoft Word, Excel and Outlook programs.

Abilities: Ability to plan and organize work. Ability to write and speak effectively. Strong ability to contribute to a highly effective team.

Work Environment: Work is performed in a typical office setting.

CONDITIONS OF EMPLOYMENT

GT Independence does not enter into contracts with employees for any specific length of time. Instead, employees are considered to be at-will employees under Michigan Law. This means that either you or the Company can terminate the employment relationship, with or without a good reason, at any time. Except in cases of misconduct or unsatisfactory work performance, the Company would certainly attempt to give as much notice as is practical under the circumstances if it intended to terminate your employment. In turn we ask for the same courtesy from you, which would generally be two weeks notice for most employees. Supervisors would be expected to give about four weeks advance notice in order to allow for a smooth transition.

No employee, supervisor, or other person has the authority to enter into an employment agreement with you for any specific length of time, or under any particular conditions, or to make any agreement contrary to the terms expressed in these employment policies. The only exception is the Chief Executive Officer, and would have to be in writing signed by the CEO.



GT Independence
 JOB DESCRIPTION

IDENTIFICATION

Job Title: Director, Support Broker and State Services
Supervisor: Director of Business Development
Supervision Provided: Field Service Representatives
Effective Date: 05/01/2016

SUMMARY

General Description:

The Director, Support Broker and State Services will serve as the primary Liaison/Point of Entry on contractual requirements for programs with the State. This position is responsible for the daily management of support brokers / field services and contracts within the assigned State including monitoring and analyzing operational functions within specific geographic areas and/or product lines.

Responsibilities and Duties:

- Manages the work of field service representatives; ensures all field services are provided timely and accurately
- Coordinates activities with appropriate departments to ensure that the operational systems meet or exceed the contract requirements for the plan and plan partner(s)
- Ensures all reports and requested information are submitted accurately and timely as per specific contract/plan requirements with supporting documentation
- Functions as a resource for the development of operational systems and manages the implementation to meet contract requirements
- Serves as primary Liaison/Point of Entry on the contractual requirements and communications, providing key leadership for contract requirement functions
- Facilitates delivery of specialized education and training concerning contract responsibilities; notifies management team of contract changes and updates
- Develops and maintains rapport with internal stakeholders
- Assists with contract renewal, implementation and re-procurement activities.
- Develops positive relationships with regulatory agencies to promote quality and satisfaction
- Develops and trains field staff to ensure Stakeholder satisfaction
- Attends state and national conferences and other business development activities
- Other duties as assigned



Skills:

- Familiar with contract development and related language
- Ability to develop, organize, analyze, and implement procedures
- Leadership, Management, and Negotiation skills
- Excellent verbal and written communication skills
- Maintain confidentiality and comply with Health Insurance Portability and Accountability Act (HIPAA)
- Ability to establish and maintain positive and effective work relationships with coworkers, clients, members, providers and customers
- Uphold GT Independence mission and values

The above statements are intended to describe the general nature and level of work being performed by people assigned this title. They are not to be construed as an exhaustive list of all job duties performed by personnel so classified. They are not intended to limit or in any way modify the right of supervisors to assign, direct, and control the work of employees under their supervision.

EMPLOYMENT STANDARDS

A four (4) year degree in Human Services (psychology, sociology, social work, recreational therapy, education, nursing, physical therapy, occupational therapy, speech, etc.) and at least one (1) year professional experience working with one (1) of the following populations: elderly, adults with physical disabilities, individuals with intellectual disabilities, and persons with developmental disabilities; or

A four (4) year degree in any other subject and two (2) years' experience working with one (1) of the following populations: elderly, adults with physical disabilities, individuals with intellectual disabilities, and persons with developmental disabilities; or

A two (2) year degree in Human Services (psychology, sociology, social work, recreational therapy, education, nursing, physical therapy, occupational therapy, speech, etc.) and at least five (5) years professional experience working with one (1) of the following populations: elderly, adults with physical disabilities, individuals with intellectual disabilities, and persons with developmental disabilities. For Support Brokers working with Persons Supported, five (5) years professional experience working with persons who have an intellectual disability, without the preceding education requirements meets the minimum qualification. Supports Brokers with this experience only, and not the above educational experience, shall only be allowed to perform Support Brokerage functions for Persons Supported and not for Members; and

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Satisfactorily complete a TennCare (and DIDD, as applicable)-approved orientation and training program, as applicable, on Participant-managed services and the role of the Supports Broker. The program shall be prior approved by TennCare (and DIDD, as applicable) before staff can participate.

CONDITIONS OF EMPLOYMENT

GuardianTrac LLC does not enter into contracts with employees for any specific length of time. Instead, employees are considered to be at-will employees under Michigan Law. This means that either you or the Company can terminate the employment relationship, with or without a good reason, at any time. Except in cases of misconduct or unsatisfactory work performance, the Company would certainly attempt to give as much notice as is practical under the circumstances if it intended to terminate your employment. In turn we ask for the same courtesy from you, which would generally be two weeks notice for most employees. Supervisors would be expected to give about four weeks advance notice in order to allow for a smooth transition.

No employee, supervisor, or other person has the authority to enter into an employment agreement with you for any specific length of time, or under any particular conditions, or to make any agreement contrary to the terms expressed in these employment policies. The only exception is the Chief Executive Officer, and would have to be in writing signed by the CEO.



GT Independence
 JOB DESCRIPTION

IDENTIFICATION

Job Title: Support Broker / Field Services Representative

Supervision Received: State Director

Effective Date: January 01, 2011 rev 2/4/13; 1/25/17

SUMMARY

General Description:

Representative of GT Independence who provides face-to-face personal service to consumers, their circle of support (i.e. families, guardians, case managers/supports coordinators), and host agencies. The Support Broker / Field Service Representative anticipates and resolves customer issues and helps each stakeholder understand their unique role in Self-Determination.

Responsibilities and Duties:

Provides customer service by identifying the relevant issues, developing, communicating and executing an appropriate plan of action. Keeps records of customer interactions and transactions, recording details of inquiries, complaints, and comments, as well as actions taken. Confers with customers by telephone or in person in order to provide information about services. Identifies opportunities to add to or improve our service offerings. Completes intake forms, prepares change of address records, and issues service discontinuance orders. Checks to ensure that appropriate changes were made to resolve customers' problems. Thoroughly investigates emerging Consumer-participant issues. Contacts customers in order to respond to inquiries or to notify them of investigation results and any planned adjustments. Recommends improvements in service, or billing methods and procedures in order to prevent future problems and enhance services. Learns about new developments in their field by reading professional literature, attending courses and seminars, and establishing and maintaining contact with other social service agencies. Communicates with family members to assist them in understanding, dealing with, and supporting consumers with respect to Self Determination process. Maintains confidentiality of records relating to consumers. Collaborates with other staff members to optimize delivery of services. Uphold company values and mission. Other duties as assigned.

The above statements are intended to describe the general nature and level of work being performed by people assigned this title. They are not to be construed as an exhaustive list of all job duties performed by personnel so classified. They are not intended to limit or in any way modify the right of supervisors to assign, direct, and control the work of employees under their supervision.



EMPLOYMENT STANDARDS

A four (4) year degree in Human Services (psychology, sociology, social work, recreational therapy, education, nursing, physical therapy, occupational therapy, speech, etc.) and at least one (1) year professional experience working with one (1) of the following populations: elderly, adults with physical disabilities, individuals with intellectual disabilities, and persons with developmental disabilities; or

A four (4) year degree in any other subject and two (2) years' experience working with one (1) of the following populations: elderly, adults with physical disabilities, individuals with intellectual disabilities, and persons with developmental disabilities; or

A two (2) year degree in Human Services (psychology, sociology, social work, recreational therapy, education, nursing, physical therapy, occupational therapy, speech, etc.) and at least five (5) years professional experience working with one (1) of the following populations: elderly, adults with physical disabilities, individuals with intellectual disabilities, and persons with developmental disabilities. For Support Brokers working with Persons Supported, five (5) years professional experience working with persons who have an intellectual disability, without the preceding education requirements meets the minimum qualification. Supports Brokers with this experience only, and not the above educational experience, shall only be allowed to perform Support Brokerage functions for Persons Supported and not for Members; and

Satisfactorily complete a TennCare (and DIDD, as applicable)-approved orientation and training program, as applicable, on Participant-managed services and the role of the Supports Broker. The program shall be prior approved by TennCare (and DIDD, as applicable) before staff can participate.

CONDITIONS OF EMPLOYMENT

Knowledge: Knowledge of the principles and practices utilized by various human service disciplines in carrying out service programs. Knowledge of the needs of the populations served by GT Independence. Knowledge of human behavior and performance; individual differences in ability, personality, and interests; learning and motivation. Knowledge of principles and processes for providing customer and personal services. This includes customer needs assessment, meeting quality standards for services, and evaluation of customer satisfaction. Knowledge of the structure and content of the English language including the meaning and spelling of words, rules of composition, and grammar. Knowledge of administrative and clerical procedures and systems such as word processing, managing files and records, stenography and transcription, designing forms, and other office procedures and terminology. Knowledge of arithmetic, algebra, geometry, calculus, statistics, and their applications. Knowledge

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of business and management principles involved in strategic planning, resource allocation, human resources modeling, leadership technique, production methods, and coordination of people and resources. Knowledge of group behavior and dynamics, societal trends and influences, human migrations, ethnicity, cultures and their history and origins.

Skills: Personal computer skills; writing and communication skills, good driving skills.

Abilities: Ability to understand and work well with a variety of financial and human service disciplines. Ability to plan and organize the work involved in developing and maintaining a business. Ability to write and speak effectively. Strong ability to participate in a highly effective team.

Work Environment: Work is performed in a typical office setting or other community settings. Travel is required.

- I. **PURPOSE:** To establish a procedure to ensure payments for services that are disbursed are within the authorized limits for the person receiving services.
- II. **APPLICATION:** Vermont Attendant Services Program
- III. **DEFINITIONS:**
 Authorization: approved allowance according to the Self Determination Budget, which states authorized begin and end dates, service codes, number of units of service authorized, unit type, and authorized rate.
 Eligible Participant: Medicaid Beneficiary who qualifies to receive Program Funded Services during a given period.
- IV. **POLICY:** GT Independence will monitor and disburse payments that are within the total authorized amount and withhold payments that are unauthorized according to the defined parameters. GT will update service authorizations based on new ISPs and ISP amendments. GT will monitor spending, report issues of overspending to ASP Clinical Staff, and ensure the cost-effectiveness of the ASP through enacting payment limitations identified in ASP services manual.
- V. **PROCEDURE:**
- A. All encounter data will be reviewed before funds are dispersed to employees using the following established procedure:
1. Review submitted service/claims documentation:
 - a. Timesheets submitted late will be processed if they are received within 90 days from the first date of service documented on the timesheet; however, late timesheets due prior to the end of the fiscal year will not be processed later than 30 days past the end of the fiscal year.
 - b. Overlapping/concurrent services will be deemed unauthorized.
 - c. Timesheets that violate 'Timesheet Submission Rules' will be rejected.
 2. Review encounter data for available authorization:
 - a. Encounter data will be entered into GT's system to determine if the service provided was authorized and does not exceed bi-weekly budget allocation (in dollars).
 - b. GT staff will verify that a current budget and authorization is in place and active for the time period reflected on the service documentation.
 - c. Services submitted that exceed the bi-weekly budget allocation will be deemed unauthorized and will not be processed for payment.
 - d. Services will be deemed unauthorized and payment will not be issued under the following conditions:
 - i. The submitted service documentation causes the bi-weekly budget to be exceeded in terms of dollars.
 - ii. No authorization exists in GT's system for the submitted service documentation.
 - iii. Overlapping/concurrent services have been submitted.
 3. Notification:
 - a. Customer Service Associate will notify the designated clinical team member, employers, and employees of unauthorized services that were unpaid per this policy.

4. Authorization received:

- a. Customer Service Associate will coordinate with designated clinical representative to obtain authorization for unpaid services if deemed appropriate.
- b. Timesheets or units that were unpaid due to a lack of authorization but for which an authorization was subsequently received will be processed on the following pay period if the timesheet meets the appropriate submission parameters.

VII. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually by Operations and the Chief Executive Officer.

DRAFT

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- I. PURPOSE: To establish policies and procedures for conducting a Consumer Enrollment meeting.
 - II. APPLICATION: All programs operated directly or under contract with Community Mental Health or other State Agencies.
 - III. REFERENCE:
 - IV. DEFINITIONS: Governmental agencies include but are not limited to Community Mental Health Agencies, Department of Human Services Agencies, Rehabilitation Services, County and State level Area Agencies on Aging. Self determination activities include those services provided by the contracting Agency included in the Self Determination budget submitted by the agency and the consumer.
 - V. POLICY:
 - A. GT Independence will communicate with self determination participants and their employees to assure that they understand the principles of self determination, the role of the fiscal intermediary, their role in the program, and the rules, conventions, and regulations that govern the employment of staff.
 - B. Whenever possible, Field Service Representatives will convene an enrollment meeting to include the self determination participant, his/her supports coordinator, employees, and others who are part of the participant's circle of support.
 - C. Field Service Representatives will explain the required forms and their purpose within the program.
 - D. Field Service Representatives will test for understanding of the issues described above during the course of communication with participants, employees, supports coordinators and others.
 - VI. PROCEDURE:
 - A. During the initial communication with the Supports Coordinator, the Field Service Representative will seek to schedule the enrollment meeting. The Field Service Representative will be responsible for confirming the meeting time and place. If the participant cannot be contacted then the Field Service Representative will seek assistance from the Supports Coordinator to set up a meeting.
 - B. At the enrollment meeting the Field Service Representative will wear their identification badge with their picture visible, and will provide the badge for inspection upon request.
 - C. The Field Service Representative will review the role of the Supports Coordinator, the role of the Fiscal Intermediary, and the role of the participant as they relate to the self determination process.
 - D. At the enrollment meeting the Field Service Representative will review each document required by the participant or his/her employee in order to comply with Agency, State, and Federal requirements.
 - E. The Field Service Representative will seek to answer any questions and advise the participants of their right to have the documents reviewed by an attorney. The Field Service Representative will review the forms to ensure they are completed and signed.
 - F. If the participant desires to further review the document or have them reviewed by legal counsel then the Field Service Representative will leave the documents which can be signed and returned at a later date. If the participant chooses not to complete the necessary paperwork for the program then the Field Service Representative will honor their decision and the supports coordinator will be contacted such that alternative arrangements can be made.

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- I. PURPOSE: To assure that all Federal, State and Local Tax Documentation is completed for F/EA and Consumers in accordance with IRS guidelines.
- II. APPLICATION: All programs operated directly or under contract with Community Mental Health or other State Agencies.
- III. REFERENCE:
A. Internal Revenue Code and Individual state Tax Codes (as applicable).
- IV. DEFINITIONS: N/A
- V. POLICY: GT Independence is committed to providing services that are in compliance with the procedures and rules defined by the IRS that are relevant to our business.
- VI. PROCEDURE:
- A. The CFO will direct the accounting department to conduct the following Federal Tax Reports:
1. Filing Form 941. Payroll information is pulled from the accounting software under payroll processes. A report called payroll register without 1099 lists the detail for which Form 941 was populated.
 2. Schedule R. Payroll information is pulled to a report for the Schedule R which list payroll and withholdings by Federal Employer Identification Number. The Schedule R, register without 1099 report and the actual Form 941 will be reconciled for total wages and total withholdings.
 3. Schedule B. Payroll software populates the Schedule B from the payroll tax register and must match the Payroll Tax Summary report.
- B. The CFO will direct the accounting department to make the following Federal Deposits
1. Payroll amounts are monitored daily. When liability exceeds \$100,000 per Circular 230, taxes are electronically deposited through the EFTPS system.
 2. The payroll tax summary report is run for the corresponding check dates.
 3. A YTD payroll tax summary is also run and taxes are reconciled to allow for any void or reissued checks after the fact. In the event of quarter end, two deposits are made, one for each quarter.
 4. Total deposits will match Schedule B and the corresponding line item on the Form 941.
 5. Taxes are reconciled monthly to show actual liability at month end. Deposit summaries are kept on hand for reference.
- C. The CFO will direct the accounting department to make the following FUTA payments.
1. FUTA withholdings are made through the payroll software at 0.8% for the first \$7,000 wages per employee plus any FUTA tax credit reductions. FUTA rate is updated yearly per changes to the tax credit reduction.
 2. FUTA deposits are made quarterly. A payroll tax summary is run for the quarter and total amounts of withholdings are deposited via EFTPS. A YTD summary is run to account for any voids or reissues after the fact. Deposit summaries are kept on hand for reference.
- D. The CFO will direct the accounting department to monitor the IRS website regarding the Advanced Earned Income credit due to the repeal effective 1/1/2011.
- E. The CFO will direct the accounting department to make the following State income tax deposits.
1. Michigan
 - a. Aggregate Michigan taxes are deposited monthly no later than the 20th of the following month. A payroll tax summary is run for the period as well as a YTD summary to find any voids or reissues after the fact.
 - b. Form 165 Annual Tax Reconciliation is filed by the Accounting department and total wages and tax withholding must match the W-2 total.
 - c. Documentation is maintained in the client's hard file as recognition by the State of Michigan that the Consumers ID is to be filed under GT's aggregate account. These include: 518 Michigan Tax Registration, Form 151 Power of Attorney Authorization, and Form 3683 Payroll Service Provider Combined Power of Attorney.

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2. Wisconsin individual deposits are made through the Department of Revenue website.
 - a. A payroll summary is run for all Wisconsin agencies and taxes are deposited either monthly or quarterly depending on the filing frequency. A spreadsheet is maintained to show each employer's payments to be used on their year end reconciliation W-7. Year end reconciliation must match W-2's and that year's payroll journal.
 - b. Documentation maintained in the Wisconsin client's hard file for recognition by the State of Wisconsin that the Consumers ID is to be file by GT are: BTR 101 Application for Business Tax Registration and form A-222 Power of Attorney.
 3. North Carolina Department of Revenue
 - a. To make deposits, the Access database creates the personalized return NC-5. The form is populated with the withholding data, mass printed and a batch check with adding tape attached.
 - b. The Accounting department will file the annual reconciliation, NC-3 at year end.
 - c. Documentation is maintained in the client's hard file which shows recognition by the State of North Carolina for that employer ID to be filed by GT Independence. These include: NC-BR Application for Business Tax Registration and Gen-58 Power of Attorney.
- F. The CFO will direct the Accounting department to make the following State Unemployment tax payments.
1. Individual tax ID's each file separately.
 2. The Accounting department will prepare Unemployment forms for each Consumer, verify the data and produce one check per agency batch and mail via US Postal Service to the appropriate State Agency.
 - a. Michigan SUTA
 - i. Generated returns for Michigan are Form 1020 Employers Quarterly Wage Report and Form 1017 Employers Quarterly Wage Detail. The Payroll software is maintained from the state regarding annual tax rate and SUTA ID number. Each quarter the database is updated for payroll, Employer of Record and Employee SSN. The database is then audited for accuracy in wages and excess wage computations. The database is also audited for the doubling of the wage detail figures for dual clients (multiple clients under the same EIN number). Reports are printed in duplicate and tabulated to get the check amount by agency. A copy is kept for reference and tabulations must match before the check is written.
 - ii. If this is the first quarter of eligibility for the EIN, the Forms 518 Michigan Tax Registration, Form 151 Power of Attorney Authorization and Schedule A Liability Questionnaire are sent in to apply for a SUTA ID number. After an employer meets eligibility requirements any prior quarter returns that need filing are printed at that time. Registration paperwork is maintained in the client's hard file.
 - b. Wisconsin SUTA
 - i. Wisconsin registration and filing unemployment returns are done on the Department of Workforce website. Registration is completed by the Accounting department at the time of filing. A payroll summary is printed from the accounting software for that quarter and wages are manually input into the website. Any excluded employees' wages are accounted for at that time. Payment is made and a record of payment amounts is maintained on a spreadsheet.
 - ii. A Letter of Initial Determination for eligible employers as well as their internet access ID is maintained in the client's hard file.
 - c. North Carolina
 - i. North Carolina returns are printed on form NCUI 101 generated from the accounting software. Registration on form NCUI 604 is done at the time of filing. Any excluded employees' wages are accounted for at the time. Payment is made and record of payment amount is maintained with our hard copy.
 - ii. Letters of Liability Determination and Tax Rate are maintained in the client's hard file.
 - d. Florida

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- i. Florida returns are printed on Form RT-6. Record of payment amount is maintained with our hard copy.
 - ii. Wage reports, contributions, and tax rates are maintained in the client's hard copy file.

 - G. The CFO will direct the Accounting department to make the following Local Tax Filings and Payments
 - 1. The local W-4 is maintained in the employee's hard file for reference.
 - 2. An SS4 is maintained in the client's hard file from that municipality. A PIN number is assigned from the city so that taxes can be filed and deposited on the municipality's website.
 - 3. A payroll tax summary is run for that employer along with an YTD report to account for any voids or reissues after the fact. A spreadsheet for payments is maintained for reference.

VII. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

I. PURPOSE:

To ensure all garnishments received by GT Independence on behalf of Clients and their Employees are recorded and paid as deemed possible.

II. APPLICATION:

Withheld wages and deposits of garnished wages

III. REFERENCE:**IV. DEFINITIONS:****V. POLICY:**

GT Independence will execute all garnishments as directed by court orders

VI. PROCEDURES:

- A. Upon receipt of a garnishment, Payroll Staff will enter specified amount into the accounting software.
- B. Payroll Supervisor will set up the appropriate Vendor to receive payment in the accounting software as a Vendor.
- C. When a paycheck is created, the Payroll Staff will verify that the garnishment was withheld at the proper rate and/or percentage of wages.
- D. After payroll is complete the Payroll Staff then creates an AP check and mails to the Vendor.
- E. The internal control for garnishments consist of reconciliation by the Internal Auditor of accrued garnishments, employee receivable and accounts payable accounts. This insures proper recording of garnishment entries and timely payment. All accounts are reviewed monthly.

VII. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

- I. **PURPOSE:** To establish policies and procedures for receiving time reports from employees of Agency consumers.
- II. **APPLICATION:** All programs operated directly or under contract with Community Mental Health or other State Agencies
- III. **REFERENCE:**
- IV. **DEFINITIONS:**
 Governmental agencies include but are not limited to Community Mental Health Agencies, Department of Human Services Agencies, Rehabilitation Services, County and State level Area Agencies on Aging.
- V. **POLICY:**
- A. Consumer employees must submit time reports in order to be compensated for the time which they have worked.
 - B. Time reports must be legible and clearly identify the consumer and the employee.
 - C. Time reports must be signed by the consumer or his/her responsible representative acknowledging the receipt of the services covered by the time report.
 - D. The employee must sign the time report asserting that he/she did work during the hours reflected on the time report.
 - E. Employees must use GT Independence approved time reports.
- VI. **PROCEDURE:**
- A. Time reports may be faxed to our administrative offices using an approved fax number. Fax instructions are provided as part of the employee enrollment packet.
 - B. Time reports may be mailed to: GT Independence
 215 Broadus St
 Sturgis, MI 49091
 - C. Time sheets may be submitted electronically using approved electronic submission procedures.
 - D. Consumers who elect to fax time reports may also be required to send the original copies via mail to the address above.
 - E. Administrative Services personnel will check the time reports for the following attributes:
 1. Time report clearly designates who the employee and employer are.
 2. Appropriate signature by the consumer or his/her responsible representative.
 3. Appropriate signature by the employee.
 4. Absence of duplicate or inappropriate entries, ie. more than 24 hours in one day.
 5. Mathematically correct.
 6. Data reflected on the time report agrees with data submitted on the transmittal report.
 7. Hours do not overlap other employees.
 - F. Upon completion of the checking process, Call Center staff will access the consumer's records in the GT Independence accounting software and execute time report rostering procedures as described in the 'Time Report Rostering Manual'
 - G. Enter the date entered and initial the time report.
 - H. Complete the payroll process as written in 6-19 Processing Payments
 - I. File the time report in the Consumer's Payroll Files located in the file room.

VII. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

GT Independence

2017 Payroll Schedule M

<u>Pay Period:</u>	<u>Timesheets Due by 5:00 pm:</u>	<u>Payment Date:</u>
Nov. 13 – Nov. 26, 2016	Monday, November 28, 2016	Friday, December 2, 2016
Nov. 27 – Dec. 10, 2016	Monday, December 12, 2016	Friday, December 16, 2016
Dec. 11 – Dec. 24, 2016	Monday, Dec. 26, 2016	Friday, December 30, 2016
Dec. 25 – Jan. 7	Monday, January 9, 2017	Friday, January 13, 2017
Jan. 8 – Jan. 21	Monday, January 23, 2017	Friday, January 27, 2017
Jan. 22 – Feb. 4	Monday, February 6, 2017	Friday, February 10, 2017
Feb. 5 – Feb. 18	Monday, February 20, 2017	Friday, February 24, 2017
Feb. 19 – Mar. 4	Monday, March 6, 2017	Friday, March 10, 2017
Mar. 5 – Mar. 18	Monday, March 20, 2017	Friday, March 24, 2017
Mar. 19 – Apr. 1	Monday, April 3, 2017	Friday, April 7, 2017
Apr. 2 – Apr. 15	Monday, April 17, 2017	Friday, April 21, 2017
Apr. 16 – Apr. 29	Monday, May 1, 2017	Friday, May 5, 2017
Apr. 30 – May 13	Monday, May 15, 2017	Friday, May 19, 2017
May 14 – May 27	Monday, May 29, 2017	Friday, June 2, 2017
May 28 – Jun. 10	Monday, June 12, 2017	Friday, June 16, 2017
Jun. 11 – Jun. 24	Monday, June 26, 2017	Friday, June 30, 2017
Jun. 25 – Jul. 8	Monday, July 10, 2017	Friday, July 14, 2017
Jul. 9 – Jul. 22	Monday, July 24, 2017	Friday, July 28, 2017
Jul. 23 – Aug. 5	Monday, August 7, 2017	Friday, August 11, 2017
Aug. 6 – Aug. 19	Monday, August 21, 2017	Friday, August 25, 2017
Aug. 20 – Sept. 2	Monday, September 4, 2017	Friday, September 8, 2017
Sept. 3 – Sept. 16	Monday, September 18, 2017	Friday, September 22, 2017
Sept. 17 – Sept. 30	Monday, October 2, 2017	Friday, October 6, 2017
Oct. 1 – Oct. 14	Monday, October 16, 2017	Friday, October 20, 2017
Oct. 15 – Oct. 28	Monday, October 30, 2017	Friday, November 3, 2017
Oct. 29 – Nov. 11	Monday, November 13, 2017	Friday, November 17, 2017
Nov. 12 – Nov. 25	Monday, November 27, 2017	Friday, December 1, 2017
Nov. 26 – Dec. 9	Monday, December 11, 2017	Friday, December 15, 2017
Dec. 10 – Dec. 23	Monday, December 25, 2017	Friday, December 29, 2017
Dec. 24 – Jan. 6, 2018	Monday, January 8, 2018	Friday, January 12, 2018

Please remember the following about your timesheets:

- Please review the [Timesheet Submission Guidelines](#) to assure your timesheet is complete
- Timesheets must be completed with blue or black ink
- Timesheets are to be signed and dated by the employee and the employer
- Signature dates should be in MM/DD/YY format
- Must be completed with printed employer and employee names, dates, times and service type
- Only one entry is allowed per row on the timesheet - submit multiple timesheets if necessary
- Incorrect timesheets will require resubmission of corrected timesheets and will delay payment
- All resubmissions are required to have "REFAX" written at the top of the timesheet
- When working for multiple employers, you must turn in a timesheet for each employer
- Late timesheets will be held until the following pay period
- White-out, ditto marks or lines drawn down the columns are not permitted
- You cannot submit time when the person receiving services is in the hospital
- Timesheets are accepted by e-mail and fax 24 hours per day, 7 days per week – even on holidays

The office will be closed on the following days:

Thursday, November 24, 2016
Friday, November 25, 2016
Friday, December 23, 2016
Monday, December 26, 2016
Monday, January 2, 2017
Monday, May 29, 2017
Tuesday, July 4, 2017
Monday, September 4, 2017
Thursday, November 23, 2017
Friday, November 24, 2017
Monday, December 25, 2017
Tuesday, December 26, 2017
Monday, January 1, 2018

Fax your timesheets to 855-FAX-TO-GT (855-329-8648)**Timesheets are accepted by email at timesheets@gtindependence.com****Timesheets accepted online at portal.gtindependence.com****For assistance call Customer Service at 877-659-4500**

*****If your timesheet requires a refax or resubmission your payment will be delayed.**

*****Timesheets submitted that are over the authorized amount may not be eligible for payment. Please only submit time that has been authorized.**

I. PURPOSE: To ensure GT and its employees serviced with standard check distribution policies.

II. APPLICATION: All employee checks that are sent out from GT.

III. REFERENCE:

IV. DEFINITIONS:

V. POLICY:

- A. All live checks requiring a signature will have the signature stamp verified by a second mailing staff member to ensure unsigned checks do not get mailed to employees.
- B. After 10 mailing days if a check has not been received via the US Mail, GT will void original check and reissue.
- C. In order for an employee disbursement to be sent prior to the 10 mailing days, an employee will cover the stop payment bank fee.
- D. Should an unsigned check be received by an employee, GT will immediately void and reissue the check and mail to employee and instruct the employee to mail back the unsigned check.
- E. If an unsigned check is forged, GT will report to the bank for a fraudulent claim.

VI. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

- I. **PURPOSE:** To retire terminated consumers who are no longer participants/employers.
- II. **APPLICATION:** All programs operated directly or under contract with Community Mental Health or other State Agencies
- III. **REFERENCE:**
- A. Internal Revenue Code
- V. **DEFINITIONS:** N/A.
- VI. **POLICY:** GT Independence will complete the documentation required to terminate the registration of a participant when their relationship with GT Independence ends. There are different scenarios for terminating the participant's registration.
- A. When a participant changes fiscal intermediaries
- B. When a participant is no longer a participant in self determination with employees.
- VII. **PROCEDURE:**
- A. When a participant changes Fiscal Intermediaries.
1. Terminate the Federal Power of Attorney, (Form 2848). Send a copy of the Power of Attorney to the Internal Revenue Service at the same address that the original Power of Attorney was submitted. Write "REVOKE" across the top of the form 2848. If you do not have a copy of the Power of Attorney, send a statement to the IRS indicating that the power of attorney is being revoked, list the tax matters covered, and submit to the CFO for signature.
 2. Terminate the Federal Employer Appointment of Agent,(Form 2678) Send a copy of the Employer Appointment of Agent application, (Form 2678) to the address that the form was originally was sent to. Write "REVOKE" across the top of the form. Submit to CFO for signature
 3. Terminate Tax Information Authorization,(Form 8821). Send a copy of the Tax Authorization Information form to the address that the form was originally sent to. Write "REVOKE" across the top of the form. Submit to CFO for signature.
 4. Revoke the applicable state forms.
 1. Michigan
 - a. Complete Michigan Department of Treasury Form 151, Power of Attorney. Check the box on the second line of Part 4: Change in Power of Attorney. To revoke our Power of Attorney, indicate that the revocation is for both Treasury and UIA. Forward to the consumer or his representative for signature.
 - b. Terminate form 3683, Payroll Service Provider by writing revoke across the top of the form and submit it to the CFO for signature. Mail the form to the address indicated on the form.
 2. Wisconsin
 - a. The Power of Attorney, A-222 will be revoked upon receipt of the new agent's Power of Attorney.
 3. North Carolina
 - a. The Power of Attorney, GEN-58 will be revoked upon receipt of the new agent's Power of Attorney.
 4. Florida
 - a. The Power of Attorney, DR-835 will be revoked upon receipt of the new agent's Power of Attorney.

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5. Contact the successor Fiscal Intermediary to make sure that he/she to identify the document they will require from us in order for them to provide support.
- B. When a participant is no longer a participant in self determination and no longer has employees.
 1. Perform steps 1 – 4 above.
 2. File and pay the final State Income Tax Voucher
 3. Complete State specific Department of Treasury Form(s) See number 4.
 4. File and pay the final State Unemployment Tax form.
 5. Notify the Unemployment Insurance Agency by filing State specific UIA Form(s).
 6. Complete the final 941, Employer's Quarterly Tax Return and indicate in Part III that it is the final return
 7. Notify the Internal Revenue Service that the Employer Identification Number is to be retired. If the participant is deceased, indicate so in the letter.
 8. Notify the Agency that steps 1 – 7 have been performed.
 - C. Participant access to documents after termination
 1. Participants can request copies of documents at their convenience via phone.
 2. GT staff will verify the participant's identity and mail the requested documents within 48 hours.
 - D. GT will keep a copy of the termination checklist in the clients file.
 1. The checklist will be completed by Customer Service Associate and reviewed by the Customer Service Associate Team Leader.
 - E. GT will keep all terminated client files a minimum of 10 years.

VIII. REVIEW RESPONSIBILITY

This policy and associated procedures will be reviewed annually.

INTERNAL USE ONLY	
File	DATATRAC

GT Independence
Wage Change Form

Agency: _____

Person Receiving Services: _____

Employee: _____

Service Type: _____

Current Wage: _____

New Wage: _____

New Wage Effective Date: _____

This wage change form will replace any superseding wage listed on employment agreements as of the above listed effective date.

 Agency Case Manager Signature (If applicable)

 Date

 Person Receiving Services/Representative Signature

 Date

 Employee Signature

 Date

I. PURPOSE:

To ensure all Federally required year end earnings documentation is prepared and reported.

II. APPLICATION:

The policies and procedures stated herein apply to all GT Independence employees.

III. REFERENCE:**IV. DEFINITIONS:****V. POLICY:**

GT Independence will report payments of all Employees and Agencies for services rendered within the IRS guidelines.

GT Independence will provide W2's to all employees per guidelines.

VI. PROCEDURES:**A. W2**

1. A final W2 proof is created.
2. The proof is then reconciled to the 941 forms which have been filed quarterly.
3. Upon completion of reconciliation, corrections and/or adjustments are made if necessary.
4. Employee copies of W2's are printed.
5. The file to be transferred to SSA is created.
6. Media to transfer to States taxing agencies are created.
7. Employee W2's are mailed by January 31st of the following year.
8. Files are transferred to various taxing agencies according to each entities timeline.
9. A log of dates of mailing and transmissions is maintained.
10. If adjustments are made after mailing, the W2;s will be corrected and reissued and any relevant submissions will be amended.
11. All W2's are stored electronically. Copies are provided upon request.

B. W3

1. The Controller reconciles the 941 with the W3 and submits to SSA.
2. Reporting to SSA is complete with W2's and W3 by February 28th of the following calendar year if mailed or my March 31st if submitted electronically.
3. W-3's are prepared in the aggregate, per the IRS instructions for all the individuals GT represents.

C. The Chief Financial Officer reviews the annual filings of W-2's and W-3's.**VII. REVIEW RESPONSIBILITY:**

This policy and associated procedures shall be reviewed annually.

I. PURPOSE:

To establish policies and procedures to ensure effective delivery of Fiscal Intermediary Services.

II. APPLICATION:

All programs operated directly or under contract with Community Mental Health or other State Agencies.

III. REFERENCE:**IV. DEFINITIONS:**

Workers Compensation: Is a form of insurance that provides compensation medical care for employees who are injured in the course of employment in exchange for mandatory relinquishment of the employee's right to sue his or her employer for the tort of negligence.

V. POLICY:

GT Independence will obtain Workers' Compensation Insurance Policies on behalf of participants as required or requested. GT will also assist in the filing of Workers Compensation Insurance Claims.

VI. PROCEDURES:Obtaining a Policy

- If a Worker's Compensation Insurance Policy is required or requested, Customer Service will verify this cost is included in the participant's budget.
- If verified, Customer Service will proceed with applying for the policy.
- Accounting processes payment for the policies and maintains physical copies of invoices and proof of payment.
- Actual policy documentation is maintained electronically and can be provided to employers or agencies upon request.

Claims

- Employees, employers, and Case Managers may call to report an injury and should be forwarded to the Workers' Compensation representative in the Accounting Department.
- If it is not the employee who called, the employee should be contacted to complete the Employer's Basic Report of Injury and submitted to the Workers Compensation Insurance Company.
- Within 48 hours a claim number and examiner should be assigned. Contact the employee to relay this information. All further questions and documentation from the employee should go directly to the claims examiner.
- Employees may go to the doctor and facility of their choice, but must report it is a work related injury.
- If an employee will be off of work for more than seven consecutive days under doctor's order, a Wage Loss Form, Fringe Benefit Form, and Job Description Form will be required by the Workers Compensation Insurance Company.
- A paper and electronic file is to be kept with all documentation relating to the claim including notes. The paper file will be transferred to the employee file when the claim is completed.
- The CEO should be contacted immediately if there are any calls or documentation received indicating litigation.

Policy Changes

- Customer Service will notify the Workers' Compensation representative in the accounting department if there are any changes needed to the policy. These changes are e-mailed to the Workers Compensation Insurance Company.

Terminating a Policy

- Customer Service will notify the Workers' Compensation representative in the accounting department via a Termination Checklist if a policy needs to be terminated.
- A Return of Advance Form and Cancellation Request/Policy Release must be completed.
 - E-mail the Cancellation Request/Policy Release to the Workers Compensation Insurance Company.

Original Approval: 6/16/14

Revised Date:

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- Forward a copy of the Cancellation Request/Policy Release to the file room for the participant's file.
 - When the Audit Premium Form is received, fill in the refund on the Return of Advance Form and forward to the biller in charge of that agency.

VII. REVIEWS RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

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- I. PURPOSE:**
To establish policies and procedures to ensure effective delivery of Fiscal Intermediary Services.
- II. APPLICATION:**
All programs operated directly or under contract with Community Mental Health or other State Agencies.
- III. REFERENCE:**
Internal Revenue Service guidelines for Independent Contractors - <http://www.irs.gov/Businesses/Small-Businesses-&Self-Employed/Independent-Contractor-Self-Employed-or-Employee>
- IV. DEFINITIONS:**
Independent Contractor – An individual is an independent contractor if the payer has the right to control or direct only the result of the work and not what will be done and how it will be done. The earnings of a person who is working as an independent contractor are subject to Self-Employment Tax.
- V. POLICY:**
GT Independence will assist participants in the hiring and payment of independent contractors.
- VI. PROCEDURES:**
- a. Hiring
 - i. The referring agency determines what types of workers are considered Independent Contractors. If required, GT will assist the participant and worker with completing and filling IRS Form SS-8, Determination of Worker Status for Purposes of Federal Employment Taxes and Income Tax Withholding.
 - ii. A file will be maintained for each Independent Contractor containing:
 1. IRS Form W-9, Request for Taxpayer Identification Number and Certification
 2. Direct Deposit Form, if applicable
 - iii. Independent Contractor files are reviewed by Customer Service Team Leaders.
 - b. Payment
 - i. Payment will be made to Independent Contractors according to the agreed upon payroll schedule.
 - ii. Payment will be made via direct deposit, pay card, or paper check.
 - c. Issuance of IRS Form 1099-MISC, Miscellaneous Income
 - i. GT Independence will issue IRS Form 1099-MISC to all independent contractors that have been paid \$600 or more in a tax year no later than January 31st of the following year.
 - ii. GT Independence systems track all independent contractors and payments to determine issuance of IRS Form 1099-MISC.
 - iii. The CFO is responsible for reviewing this process and assuring issuance.
- VII. REVIEWS RESPONSIBILITY:**
This policy and associated procedures shall be reviewed annually.

I. PURPOSE:

To refund FICA to household employees earning when applicable

II. APPLICATION:

The policies and procedures stated herein apply to all GT employees.

III. REFERENCE:**IV. DEFINITIONS:****V. POLICY:**

Any direct hire employee of a FI EOR is to receive a refund of FICA taxes if they earn less than the federal requirement as stated in the IRS Publication Circular E for wages in a calendar year. A corresponding employer refund will be paid to the State of Vermont.

VI. PROCEDURES:

- A. An adjustment is made in the accounting software for withheld Social Security and Medicare.
- B. Year-end totals reflect gross pay with no FICA tax withheld.
- C. Employee checks are printed for previously withheld FICA taxes by February 28th of the following year by the accounting department.
- D. The billing department will apply employer credits as appropriate to the State.
- E. Form 941-X and Schedule R are used for any quarters where the wages are adjusted.
- F. Documentation of the employees' refunds and employer credits is forwarded to the file room for the files.
- G. The Chief Financial Officer is responsible for assuring FICA refunds are processed timely and accurately and applied to the employer appropriately.

VII. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

I. PURPOSE: To obtain a sufficient training guideline for all GT Independence staff.

II. APPLICATION:

III. REFERENCE:

IV. DEFINITION:

V. POLICY:

It is the policy of GT Independence that all training activity is designed to provide quality services to consumers and to meet State and Federal requirements. To accomplish their assigned duties, all direct service staff, managers and team leaders must complete a minimum standard of training to assure that our consumers receive the best support and treatment in order to achieve their desired outcomes.

VI. PROCEDURES:

The following outlines the minimum GT Independence staff training requirements.

WHAT	WHO	WHEN – Initial	WHEN – Ongoing
1. Recipient Rights, Abuse, & Neglect	- All GT Independence staff	- Within 30days of hire	- Annual update
2. Mission & Values/Branding Guidelines	- All GT Independence staff	- Within 30days of hire	- Annual update
3. Code of Ethics	- All GT Independence staff	- Within 30days of hire	- Annual update
4. CMS Medicare Parts C & D Fraud, Waste, and Abuse Training and General Compliance Training	- All GT Independence staff	- Within 30days of hire	- Annual update
5. Cultural Diversity	- All GT Independence staff	- Within 30days of hire	- Annual update
6. Person-Centered Planning	- All direct service staff	- Within 60days of hire facilitator and 120 days for others thereafter for all	- Annual update
7. First Aid & CPR & Bloodborne Pathogens NOTE Staff who work with infants or	- All direct care staff - Other individuals, as designated	- Current certificate prior to working with persons served	- As per certificate

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children must receive specific CPR training to infants & children			
8. HIPAA	- All GT Independence staff	- Within 30days of hire	- Annual Update
9. Limited English Proficiency (LEP)	- All GT Independence staff	- Within 30days of hire	Annual Update
10. Adult/Child Protection	- All direct service staff	- Within 30days of hire	- N/A
11. Other -Mandt -Gentle Teaching -Medication Management -Vehicle Training -Management Training -Vulnerable Adult -Incident Reporting -Bloodborne Pathogens - DC	- As designated depending on need or per contracted agency requirement	- As required	- As required
12. Departmental Training	- Customer Service - Payroll - Billing	- All new employees will participate in a departmental training program within the first 30 days of employment	- As required
13. Identification of Unsafe Environmental Factors and Reducing Physical Risks	- All GT Independence staff	- Within 30days of hire	- Annual Update

GT Independence will:

- A. Maintain procedures to outline the process for carrying out the required training.
- B. Make continuing education available to all staff in response to training needs and advancement within the company.
- C. Monitor providers and verify that providers' staff has the required trainings.
- D. Assess and identify any other training that may be needed beyond the required trainings.
- E. Review required trainings annually as part of the compliance and quality improvement process.

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VII. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

I. PURPOSE:

To establish policies and procedures to ensure access to services that provide a culturally competent atmosphere that allows for meaningful participation by the individual receiving services.

II. APPLICATION:

The policies and procedures stated herein apply to all GT Independence employees.

III. REFERENCE:**IV. DEFINITIONS:**

Relay Services - Communication systems that allow hearing persons and Deaf, hard of hearing, or speech impaired persons accessibility to communicate, typically via a Teletypewriter (TTY).

V. POLICY:

- A. GT Independence will provide interpretation services at the cost of the company when needed.
- B. Staff who utilize interpretation services will do so in a cost effective and efficient manner.
- C. GT Independence will provide alternate format written materials such as large print, Braille, and other languages upon request.
- D. GT Independence will maintain a minimum of three Spanish bilingual Customer Service Associates.

VI. PROCEDURES:

- A. Staff will collaborate with the referring agency on providing interpretation services.
- B. If the client prefers, they may utilize a family member or person of their choice for interpretation.
 - a. This is not recommended.
 - b. Staff must have the person sign an Interpretation Waiver.
- C. Use of interpretation services must be approved by authorized personnel. The following are the only individuals who can authorize interpretation services. Each will have an individual access code that will be kept confidential.
 - a. Chief Executive Officer
 - b. Chief Financial Officer
 - c. Business Director
 - d. Customer Service/Call Center Manager
 - e. Field Service Managers
- D. Voices for Health - MUST have approval.
 - a. Phone Interpretation (Available nationally)
 - i. If you receive a call from someone speaking another language, immediately record the phone number they are calling from and attempt to get their name.
 - 1. If the person stays on the line, make a conference call by:
 - a. Pressing the *conference* button. The person will be put on hold.
 - b. Dial Voice for Health at 1-800-650-0310.
 - c. Press the *conference* button to join the calls.
 - 2. If the person does not stay on the line, continue connecting to the interpretation service and give them the number to conference in.
 - ii. Press 3 for the Phone Interpreting menu.
 - iii. Press 2, an authorizer must be available to enter in the access code.
 - iv. The following information is needed:
 - 1. Access Code
 - 2. Your name
 - 3. Your program/department
 - 4. Language needed (if you are unsure, assistance will be provided)
 - 5. Client name
 - 6. Client telephone number (if client is not on-site)
 - v. Record the call serial number in the Call Log System.
 - vi. Dispatcher will connect you to the interpreter and client, if not still on the line.

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- vii. If the call did not originate with a CSA, transfer to the appropriate CSA as soon as possible after connecting to the interpretation service to increase time and cost efficiency.
 - viii. This service may also be utilized when making an outgoing call to a participant or employee who is in need of an interpreter.
 - b. On-site Interpretation (MI only)
 - i. Must be scheduled in advance, Spanish 48 hours, other languages minimum of 72 hours.
 - ii. VFH will assist in determining if they can provide an on-site interpreter at a comparable cost to phone interpretation. If phone interpretation is determined to be more economical, it will used.
 - 1. Dial 1-800-650-0310.
 - 2. Press 2 to be transferred to a request coordinator.
 - 3. Provide the following:
 - a. Your name
 - b. Your business name and program/department/location
 - c. Language needed
 - d. Appointment date, time, expected duration, and location
 - e. General purpose of the appointment
 - f. Contact person at the appointment
 - g. Client name
 - h. Any special requests
 - 4. Record the assignment number on the participants paperwork.
 - iii. Billing begins at the scheduled appointment time or earlier if services begin prior.
 - iv. 12 hours notice is required for cancellation to avoid a 1 hour cancellation fee.
 - 1. Call 1-800-650-0310.
 - 2. Press 2 to be transferred to a request coordinator.
 - 3. Provide the assignment number to the request coordinator.
 - 4. Record the cancellation information on the GT Interpreter Authorization Form and send to the Executive Administrative Assistant, in case of any billing errors.
 - v. Minimums
 - 1. Sign Language interpreting has a minimum 2 hour charge.
 - 2. Other language interpreting has a minimum 1 hour charge.
 - E. Other states needing in person interpretation services will be contracted in a cost efficient manner by field services.
 - F. Relay Services
 - a. Relay Services are available in most states by calling 7-1-1. No approval is needed to utilize these services.
 - i. Individuals may call 7-1-1 to gain access to relay services to call us.
 - ii. We may call 7-1-1 to contact individuals with appropriate devices.
 - b. If you get a call from a Relay Center, **DO NOT** hang up.
 - c. See the attached information from each states' Relay Service for more information.

VII. REVIEWS RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

I. PURPOSE:

Personnel (paid and unpaid staff) will adhere to the highest standards of ethics and integrity to protect and advocate for each person's human rights, welfare and best interests as stated in the Company's mission, values and beliefs and as cited by state and federal requirements.

II. APPLICATION:

The policies and procedures stated herein apply to all GT Independence employees/volunteers.

III. REFERENCE:**IV. DEFINITIONS:****Retaliation**

Conduct or communication, taken in response to an employee complaint or report of alleged waste, fraud, or abuse, violation of consumer privacy or recipient rights, or of any of the work rules of the organization that result in the adverse change in the work status of an employee.

Retribution

Conduct or communication, taken in response to an employee complaint or report of alleged fraud or abuse, violation of consumer privacy or recipient rights, or of any of the work rules of the organization that result in a hostile work environment or dispensing of informal punishment.

Nondiscrimination

GT Independence shall not discriminate against any employee or applicant for employment with respect to his/her hire, tenure or conditions of employment because of:

1. age
2. color
3. marital status
4. gender
5. national origin
6. physical appearance (i.e., weight and height)
7. race
8. religion
9. disability

V. POLICY:

This Code of Ethics embodies certain standards of behavior governing professional relationships for all GT Independence personnel with those they serve, colleagues, Executive Board, contractual relationships, in marketing, other professions and the community.

Personnel shall conduct themselves in a manner that encourages complete confidence among persons served and the general public. Personnel shall conduct themselves in such a way as to avoid all situations where prejudice, bias, or opportunity for personal gain could influence their professional decisions. Personnel shall abide by the Company's Code of Ethics as well as the ethical standards set forth by their professional organizations and/or associations.

All GT Independence personnel shall commit themselves to know and abide by The Code of Ethics and, as such, agree that they shall:

- Seek the informed consent and participation of persons served in decisions about service, care, and/or treatment.
- Respect the privacy and confidentiality of persons served and use information gained through professional relationships in a responsible manner.

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- Provide services uniformly and consistently, respect diversity, not condone or engage in discrimination based on race, color, religion, age, gender, sexual orientation, ethnicity, marital or socioeconomic status or disability and work to prevent and eliminate discrimination in rendering services, in work assignments and employment practices.
 - Regard as their primary professional obligation the welfare of the person or persons served and give precedence to the responsibility of making decisions based solely on the needs of the individual over their personal interests.
 - Hold themselves responsible for the quality and extent of the services performed.
 - Not engage in sexual, exploitive or abusive behavior with persons they serve.
 - Make the consumer's rights, including the right to file grievances, known.
 - Practice ethical conduct in the witnessing, notarizing, signing, and dating of documents.
 - Treat with respect the findings, views, and actions of colleagues and use appropriate channels to express judgments on these matters.
 - Practice within the recognized knowledge and competence of their profession.
 - Not discriminate against or otherwise infringe upon the rights of recipients of services or applicants for services as required by but not limited to the following statutes:
 - Elliot-Larsen Civil Rights Act, P.A. 453 of 1976, as amended
 - The Americans with Disabilities Act of 1990, P.L. 101-336, 104 Stat 327 (42 USC 12101 et seq), as amended, and regulations promulgated there under.
 - Title VI of the civil Rights Act of 1964 (42 USC 2000d et seq), Section 504 of the Federal Rehabilitation Act of 1973, as amended (29 USC 794), Title IX of the Education Amendment of 1972, as amended (20 USC 1681-1683 and 1685-1686) and the regulations of the U.S. Department of Health and Human Services issued there under (45 CFR, Part 80, 84, 86 and 91).
 - The Age Discrimination Act of 1975 (42 USC 6101 et seq).
 - GT Independence personnel shall make decisions regarding the consumer's care based solely on the Person Centered Plan and budget when applicable. Should differences in opinions regarding care and/or treatment occur, the needs and choices of the consumer shall always be the first consideration.
 - GT Independence personnel are prohibited from accepting or making payments or other considerations for referring persons to another service.
 - To avoid conflict of interest and promote freedom of choice, GT Independence personnel are prohibited from referring or steering consumers to private practice individuals or organizations in which current or past GT Independence personnel or their immediate families are engaged. Consumers shall always be given a list of choices, which may include both private and public practitioners with the freedom to make their own choices.
 - All business decisions shall be made entirely on the basis of merit, therefore, the agency is strongly opposed to having personnel accept gifts of any kind from whom the agency has a direct business relationship. If personnel receive a gift or are asked to accept a gift, they must promptly contact their supervisor.
 - Personnel are prohibited from the following activities in relation to consumers or family members of consumers under any circumstances:
 - Soliciting or accepting monetary contributions or gifts
 - Borrowing/Lending money or personal property
 - Selling any type of merchandise or service

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Revise Date: 1/8/13, 5/2/13, 4/24/14, 2/6/15

- o Fundraising

- Personnel are not to commingle, borrow or pledge the funds of a consumer. Michigan law makes this a misdemeanor, with the possibility of 2 years in jail, a \$25,000 fine, or both if convicted.
- An employee may not be involved in operating a business, which resembles or competes with the business or activities of GT Independence. If an employee has or is considering an outside business involvement which would appear to violate this rule, the employee should advise the Chief Executive Officer immediately.
- All employees/volunteers of GT Independence are expected to comply with ethical standards as related to state and federal licensing rules and laws.

Ethical Standards in Employment Practices

GT Independence subscribes to a policy of equal employment opportunities and will maintain and conduct all practices relating to recruitment, employment, engagement, discipline, transfer, promotion, and other terms and conditions of employment in a manner which does not discriminate on the basis of race, color, religion, national origin, age, sex, familial status, handicap, veteran's status, marital status, height or weight; to preserve the confidentiality of records regarding arrest, detention, or other disposition in which a conviction does not result.

GT Independence will not discriminate against persons with disabilities in regard to any employment practices or terms, conditions, and privileges of employment. This prohibition covers all aspects of the employment process, including recruitment, testing, hiring, assignment, evaluation, disciplinary actions, promotion, medical examinations, training, layoff/recall, termination, compensation, leave, benefits, or any other term, condition or privilege of employment. Further, GT Independence makes a general practice of taking affirmative action to eliminate discrimination based on sex, race or a disability with respect to each of the aspects of the employment process described above.

The Company does not refuse to recruit, hire, promote or transfer individuals because of a physical or mental handicap that is unrelated to that individual's ability to perform, with or without accommodations, the duties of a particular job or position. If you are a person with a covered disability as defined by law, then the Company will make every effort to make accommodations.

Under Michigan law, a person with a covered disability needing accommodations for employment must notify the Employer in writing within 182 days after the need is known or reasonably should have been known. Failure to notify the Employer may result in a loss of rights. Should an applicant, employee, or volunteer have any questions or concerns in regard to these rights, please contact the CEO immediately in writing.

Staff assignments are made with the best interests of the consumers in mind and after consideration of their input. GT Independence actively supports the consumer's right to privacy regarding personal care issues by designating the appropriate sexual gender of persons who work directly with consumers where applicable. The applicant pool utilized by this Company has been established so that decisions shall be based upon full consideration of all applicants for the position with primary candidacy being given to the qualified individual who best fits the opening, as determined by the sole discretion of the Employer.

VI. PROCEDURES:

In order to regulate the reporting of a potential ethics violation and to assist in the proper investigation and resolution of the matter, the following procedure will be followed.

Failure to report said behavior constitutes grounds for immediate dismissal. The supervisor will then immediately report this behavior to the Chief Executive Officer. Following an investigation disciplinary action may result and may be in the form of a reprimand, suspension, or dismissal. Additionally any employee suspected of unethical behavior should be reported to Human Resources, who in turn will report the behavior to the CEO. Following an investigation, disciplinary action may result and may be in the form of a reprimand, suspension, or dismissal.

A. Report within the Agency

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1. All personnel suspected of unethical behavior, including being charged with a criminal act which requires fingerprinting, shall report any such behavior to their immediate supervisor and complete an incident report within a 24-hour period.
2. If an employee believes he or she has been subjected to or witness to unethical conduct, as defined by the agency, State or Federal regulations, or a widely recognized professional organization (e.g., NASW, APA, CARF), he or she will report such conduct to his or her immediate supervisor, Human Resources Coordinator, CFO or CEO and complete an incident report within a 24-hour period.
3. The employee may make, if he or she so chooses, simultaneous reports of suspected unethical conduct to any or all of the following: supervisor of the employee, and the Human Resources Coordinator, Human Resources Coordinator, CFO or CEO within a 24-hour period. If the alleged violator is the employee's immediate supervisor, then he or she will report such conduct to that supervisor's immediate supervisor. There will be no reprisal for personnel reporting.

B. Report Outside of the Agency

1. If the subject of alleged unethical conduct believes that such conduct also violates State or Federal law, he or she may file a complaint with the proper authorities.
2. An employee who is subjected to or witness to alleged unethical conduct may make, if he or she so chooses, a report to the suspected violator's certifying professional board or organization, if there is one.

C. Protection of Employee Reporting a Violation

Employees are expected to report violations or suspected violations and there is to be no retaliation or retribution to the employee who reports a violation, participates in hearings, investigations, legislative inquiries, or court action.

D. Agency Response to a Report of a Suspected Violation

1. All reports of suspected ethics violations will be investigated in a timely manner. The procedures for the suspected violation will be determined by the type of violation. Whenever possible Recipient Rights issues will be investigated by the Recipient Rights Officer (refer to the Recipient Rights policies); Regulatory Management issues (i.e., Medicaid Waste, Fraud, and Abuse) will be investigated by the Corporate Compliance Officer according to the Risk Management policy; and the HR Coordinator will investigate other suspected code of conduct violations. In instances where the investigating person believes there would be a conflict of interest, or the scope of the investigation is beyond his/her experience or expertise, the CEO or CFO may choose to investigate or appoint another party (including Corporate Counsel) to assist or complete the investigation.
2. At a minimum, such investigation will involve a review of written documentation and supervisory interviews with the complainant, alleged violator, and witness completed within 30 days. Any action deemed necessary to provide for the safety and fair treatment of all concerned can be taken immediately or throughout the investigation process.
3. If investigation finds that an ethics violation did occur, disciplinary action will take place that is consistent with the severity of the violation and the principles of progressive discipline. A severe violation of ethical standards may result in immediate discharge from employment.
4. If investigation finds that an ethics violation did occur, the agency may report such violation to the violator's certifying professional board or organization. Such report will be made if the employee's

misconduct is considered severe, or if there is a pattern of repeated violations. Education will be performed to ensure personnel are aware of the requirements of this policy.

5. The agency will, within the limits of State or Federal law, cooperate with any investigation that may be conducted by the police, other State or Federal agency, or certifying board or organization.

E. Examples

The following is a list of examples of unethical conduct. This list should not be considered comprehensive or exhaustive, and is instead provided as a general guideline to the parameters of ethical conduct and the severity of misconduct. Similarly, actual disciplinary action will depend upon a variety of factors, including the particular circumstances of the immediate offense, the concept of progressive discipline, and the employee's status with the agency.

1. A professional or direct care employee engaging in intimate relations with a current or former client under his or her care, which may include dating or sexual encounter.
2. Unauthorized release of confidential client information, which clearly lacks good faith and best interest of the client, and is not supported by the most liberal interpretation of law.
3. Physical or sexual assault, stalking, or extortion of a current or former client, or engaging in threats to do so.
4. Felonious assault of a fellow employee.
5. Embezzlement from the agency.
6. Falsification of personnel or employment records for the purpose of deception regarding identity, experience, education, credentials, or background.
7. Undermining the relationship or work between therapist and client.
8. Creating, spreading, or supporting rumors that malign or degrade a fellow employee or the agency within the agency.
9. Making comments to other providers or agencies that malign or degrade the reputation or professional status of a fellow employee or the agency, (this does not include reporting alleged misconduct to the police or an employee's licensing board).
10. Misdemeanor assault of a fellow employee on work time, at an agency site, or at an agency function.
11. Borrowing a possession of one's current or former client for personal use.
12. Making rude, derogatory, or sexually suggestive comments to a current or former client.
13. Making rude, derogatory, or sexually suggestive comments to a fellow employee.
14. Accepting a gift of substantial material worth from a current or former client.
15. The repeated submission of unfounded nuisance complaints against fellow employees.

VII. REVIEW RESPONSIBILITY

This information will be reviewed annually.

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- I. **PURPOSE:** To establish policies and procedures to ensure access to services that provide a culturally competent atmosphere that allows for meaningful participation by the individual receiving services.
- II. **APPLICATION:** All programs of GT Independence as well as those under contract with GT Independence for the provision of services and supports.
- III. **REFERENCE:**
A. Medicaid Chapter III.
- V. **DEFINITIONS:**
- CULTURAL COMPETENCE An ongoing commitment to linguistic and cultural competence that ensures access and meaningful participation for all people in the service area. Such commitment includes acceptance and respect for the cultural values, beliefs and practices of the community, as well as the ability to apply an understanding of the relationships of language and culture to the delivery of supports and services.
- LIMITED ENGLISH PROFICIENCY (LEP) SERVICES An ongoing commitment to provide timely access to effective language services for persons who are unable to speak, read, write or understand English at a level that permits effective interaction with his/her service provider.
- VI. **POLICY:**
- A. A culturally competent atmosphere shall be conveyed to individuals seeking services in an easily understood manner at all times.
- B. Individuals with limited English proficiency shall be provided timely access to effective language services.
- C. Information pertaining to the availability of culturally sensitive and limited English proficiency services shall be posted and clearly accessible in a variety of mediums.
- D. All services shall be provided in a culturally competent atmosphere and will demonstrate acceptance for the individual's cultural values, beliefs, practices, and language, as well as the ability to apply an understanding of the relationships to the delivery of supports and services.
- E. GT Independence will evaluate the ethnic, cultural, and language needs of each of its area it serves on an annual basis.
- F. GT Independence will address cultural competence as part of the hiring process for prospective candidates for employment.
- G. Cultural diversity training and LEP training will be a part of new employee orientation with annual updates.
- VII. **PROCEDURE:**
- A. Customer Service will assure that all reception areas of GT Independence have information on culturally sensitive services available in a variety of mediums.
- B. Customer Service will be informed of up-to-date community resources and will assist staff and individuals who request multicultural services to ensure that provision of service and support are appropriate
- C. Customer Service will identify non-English languages that are likely to be encountered by reviewing:
1. Census data,
 2. Consumer utilization data from consumer files,
 3. Data from community agencies and organizations.
- D. Customer Service will also annually review all resources (points of contact) needed to provide effective language assistance to persons with limited English proficiency.
- E. GT Independence will question prospective candidates for employment regarding cultural competence.
- F. GT Independence will assist the consumer in identifying their cultural preference by directing them to the language poster hanging in the lobby, by helping them review the "I Speak" cards also available at all locations or through interviews with the consumer or his/her representative.

Date Approved: 08/01/2012

Date Updated: 08/12/2013

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- G. Upon the identification of the consumer's language preference, staff will contact Customer Service or one of the individuals from the Interpreter list found in the "I Speak" cards, to secure assistance and set a time for the Initial Intake/Assessment and future appointments, (at no cost to the consumer).
 - 1. If the consumer has requested a family member assist them, that individual may do so until a qualified professional can be secured, however a qualified professional must be in place no later than the third appointment.
 - 2. If the qualified professional is contracted from outside the agency, that individual/agency will sign and agree to all confidentiality requirements.
 - H. Customer Service will also provide, if necessary, the appropriate culturally sensitive assistance through the Grievance and Appeals process should the individual require help.
 - I. All personnel are expected to receive initial and annual training in Cultural Diversity.

VIII. Review Responsibility: This information shall be reviewed annually.

Consolidated Financial Statements

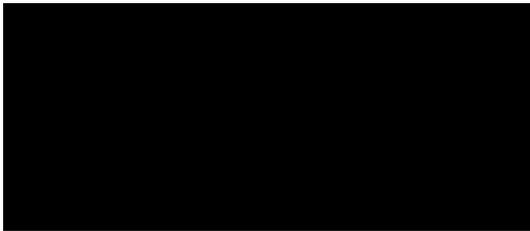
**Guardiantrac, LLC
d/b/a GT Independence**

December 31, 2015 and 2014

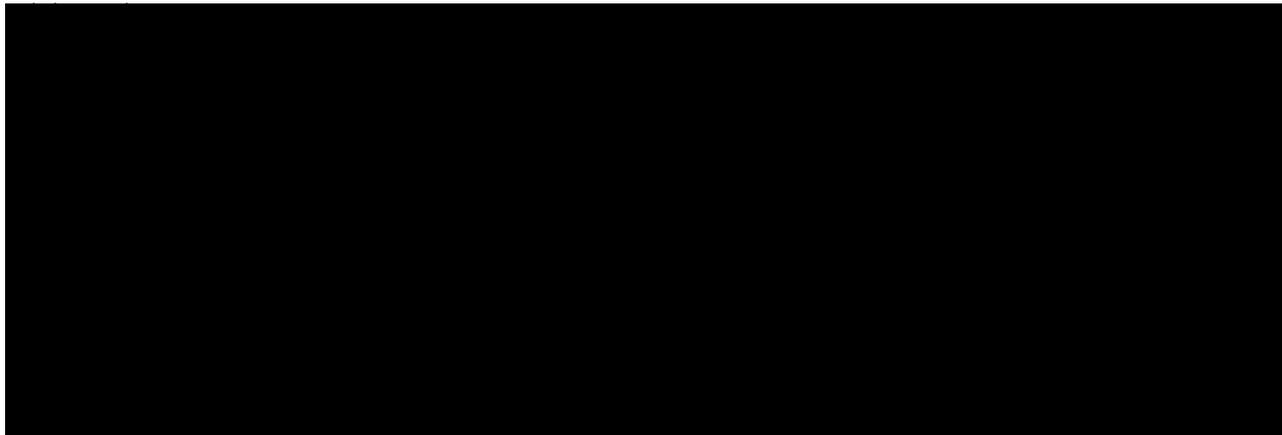
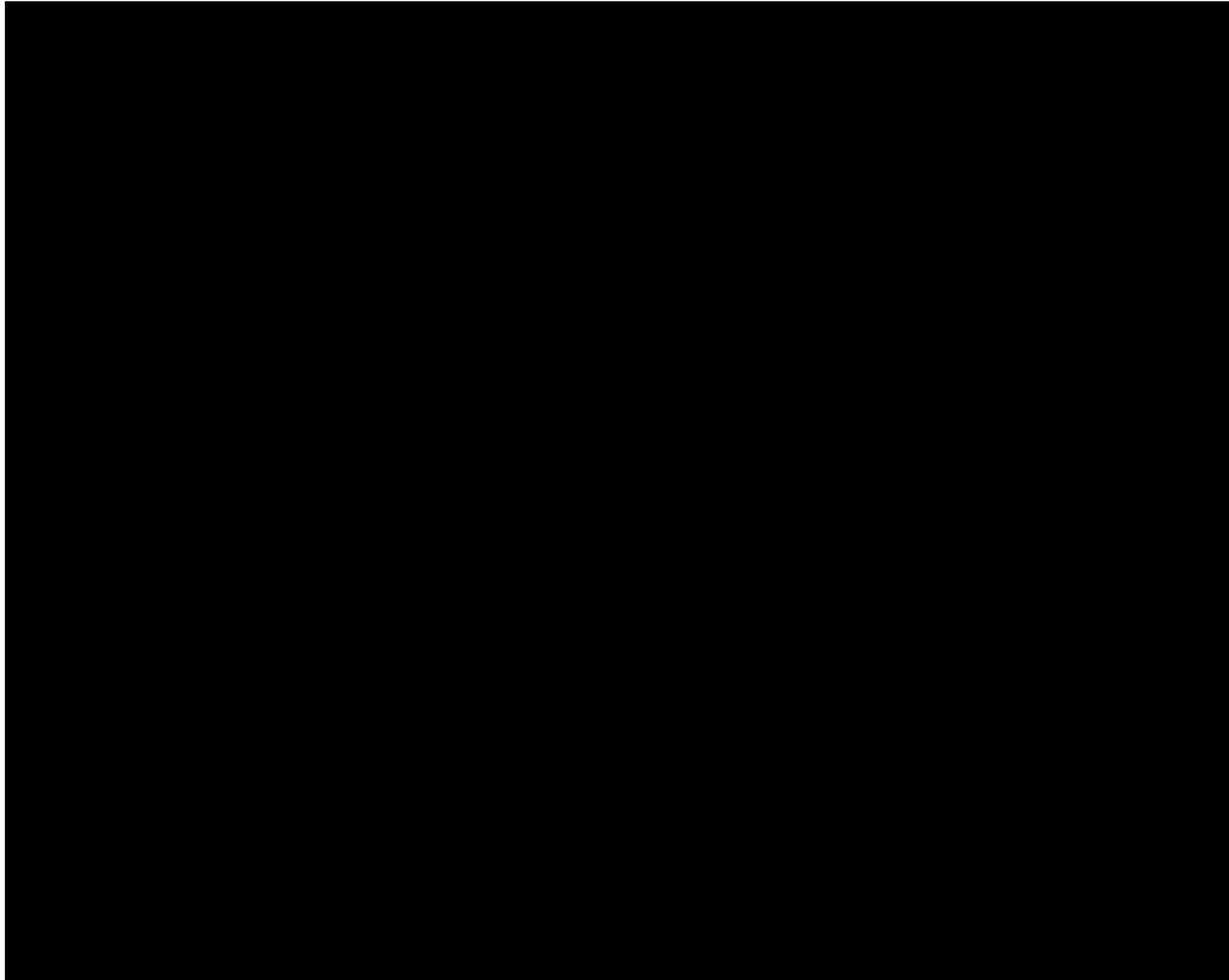
GUARDIANTRAC, LLC D/B/A GT INDEPENDENCE**Consolidated Financial Statements**December 31, 2015 and 2014

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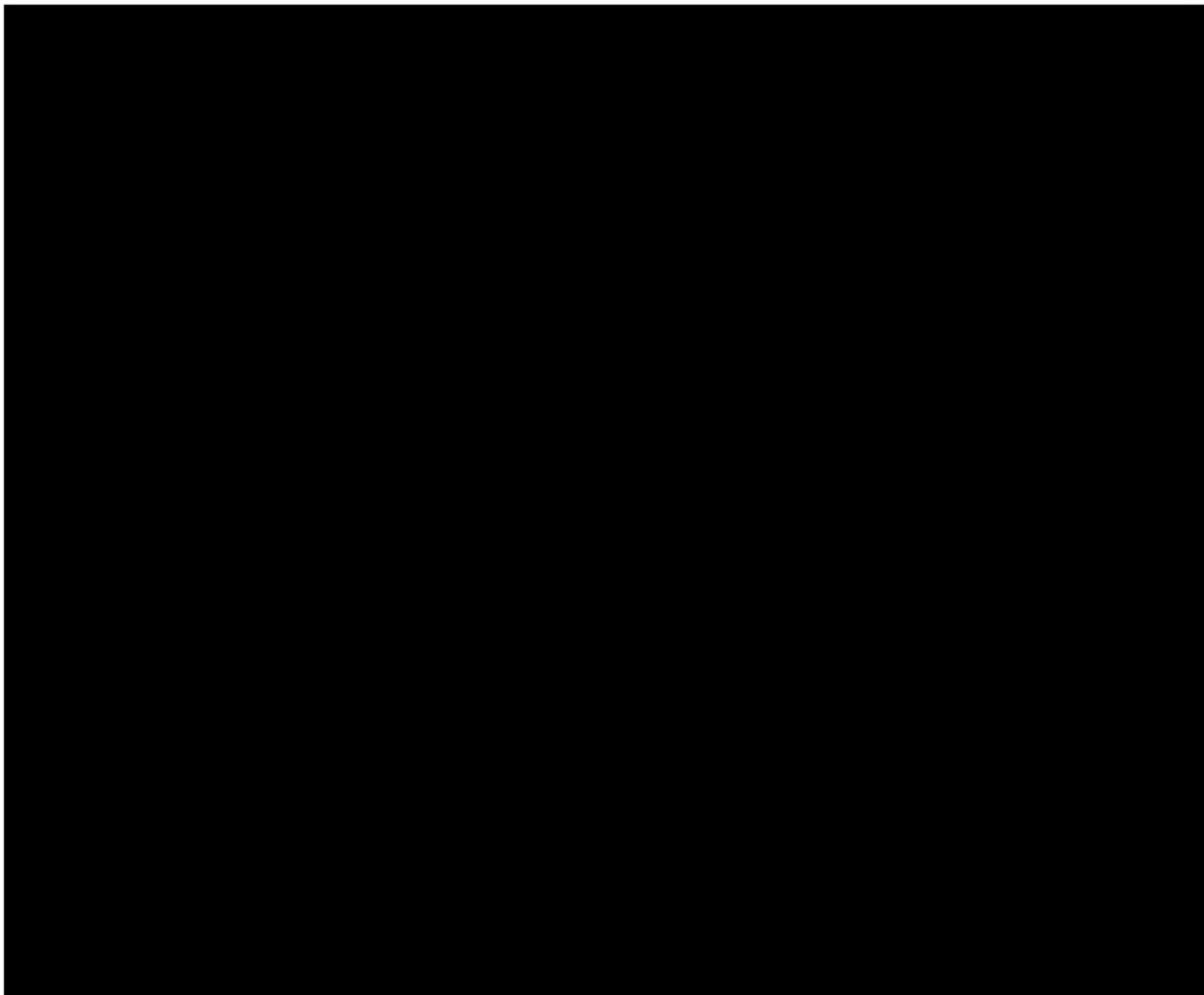
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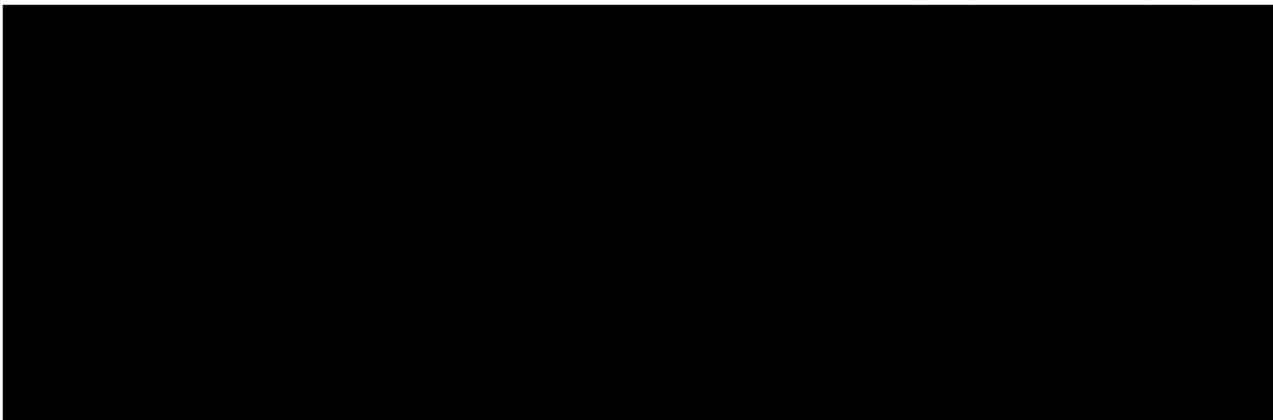
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GUARDIANTRAC, LLC D/B/A GT INDEPENDENCE

Consolidated Balance Sheets
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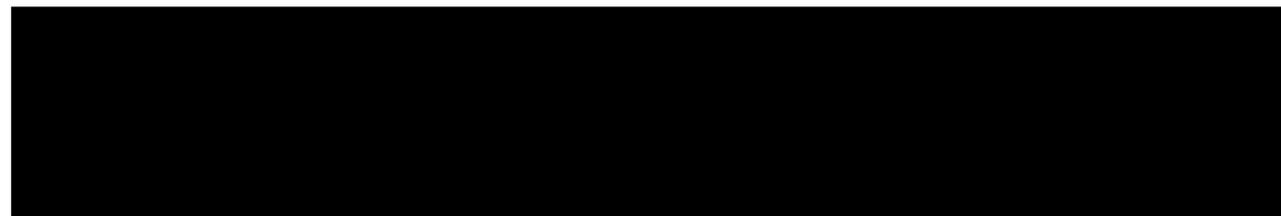
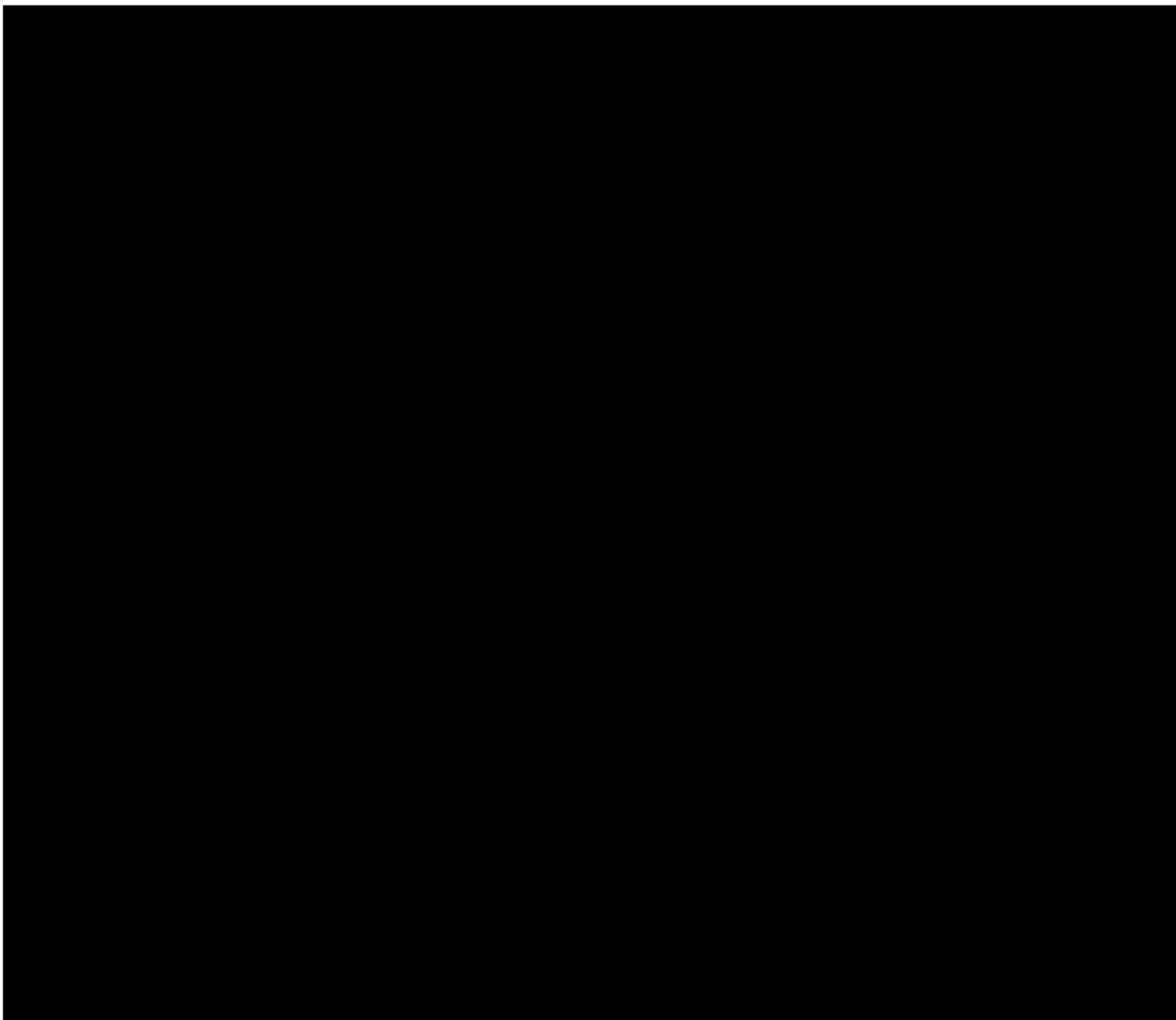




See Notes to Consolidated Financial Statements.

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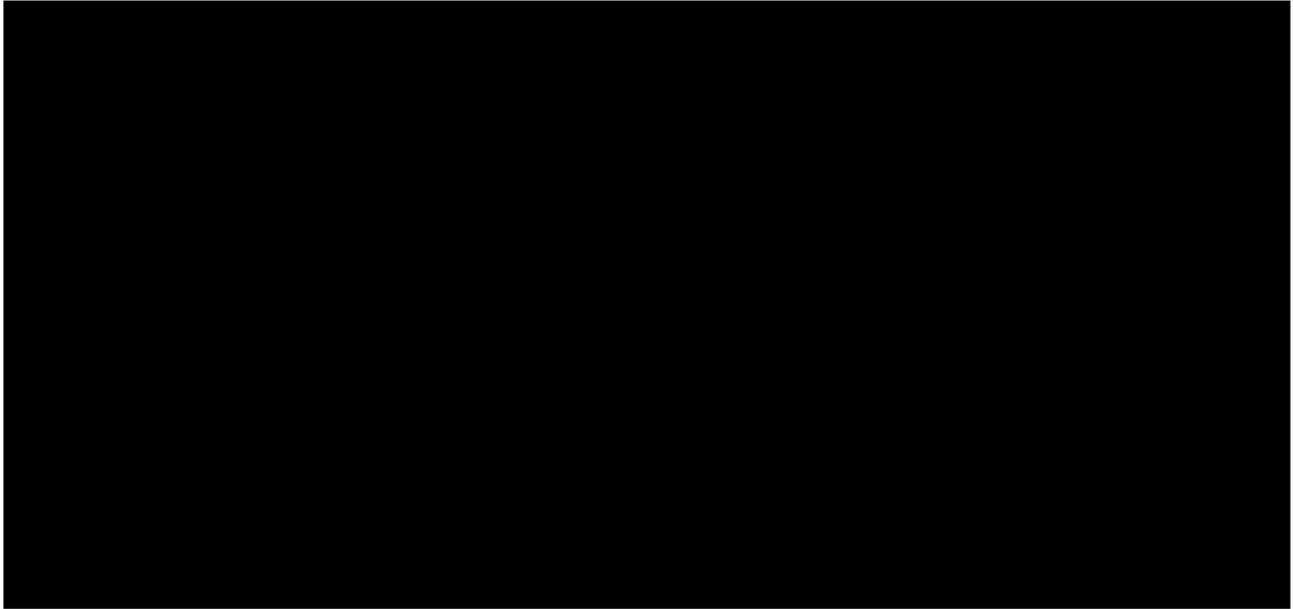
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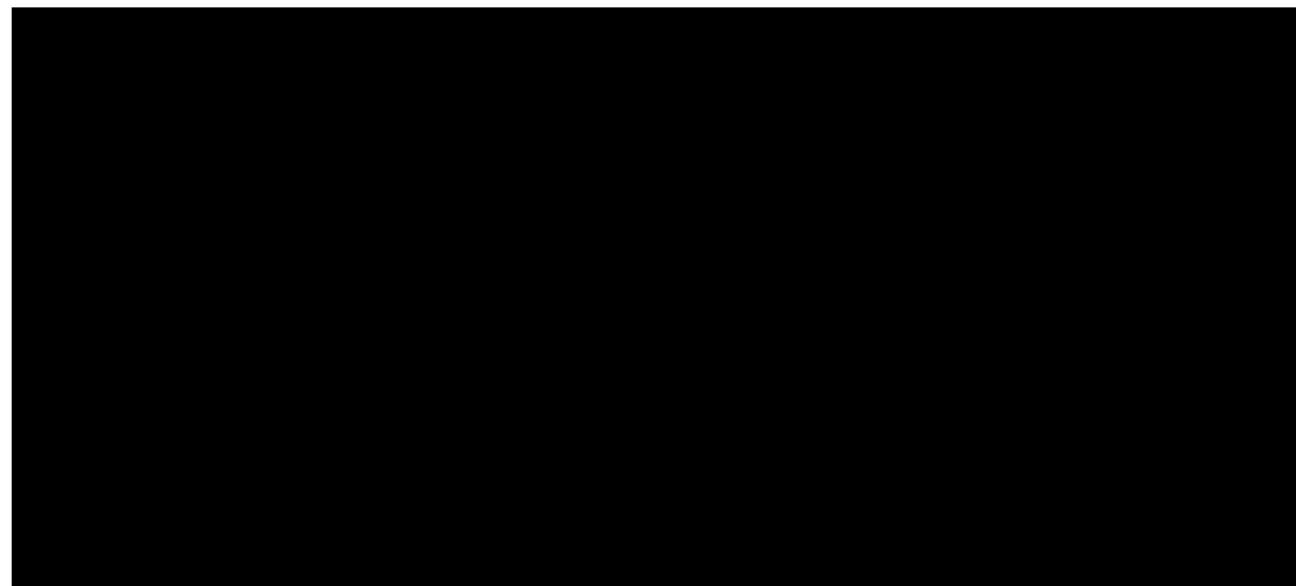
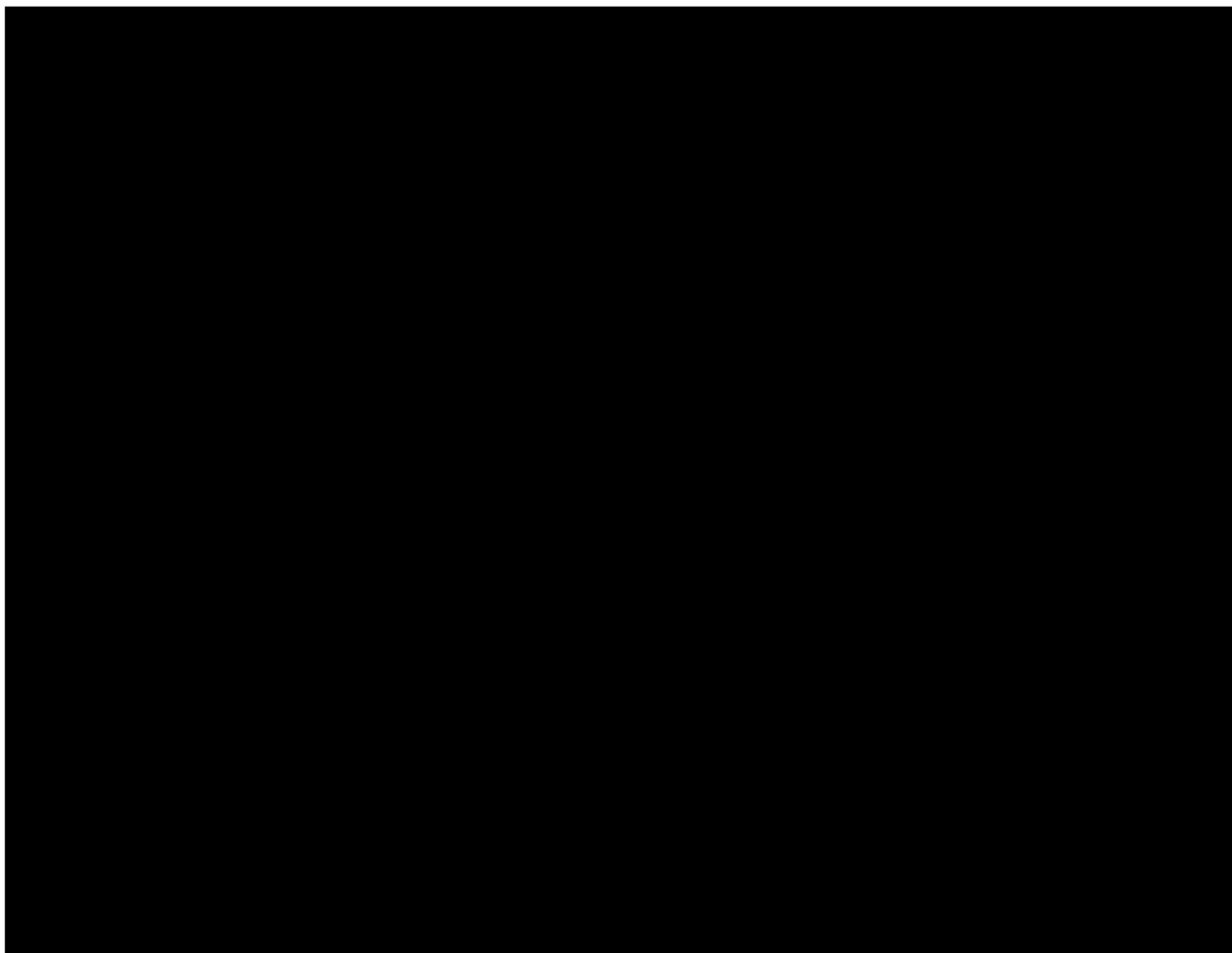
Consolidated Statements of Cash Flows
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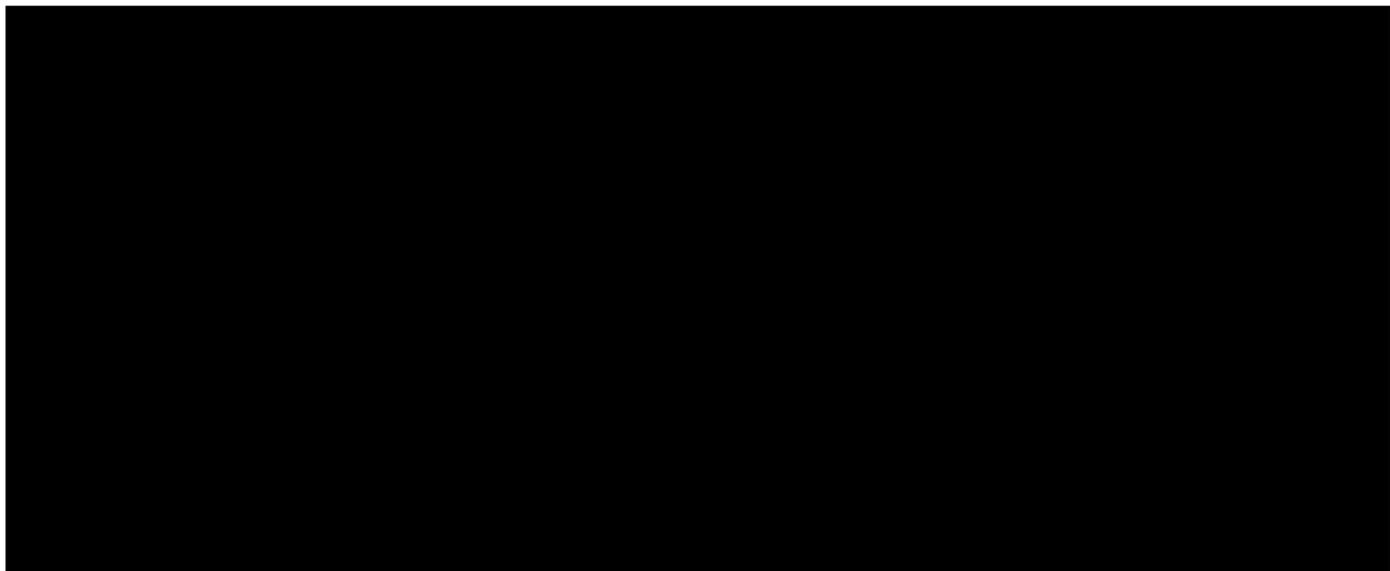
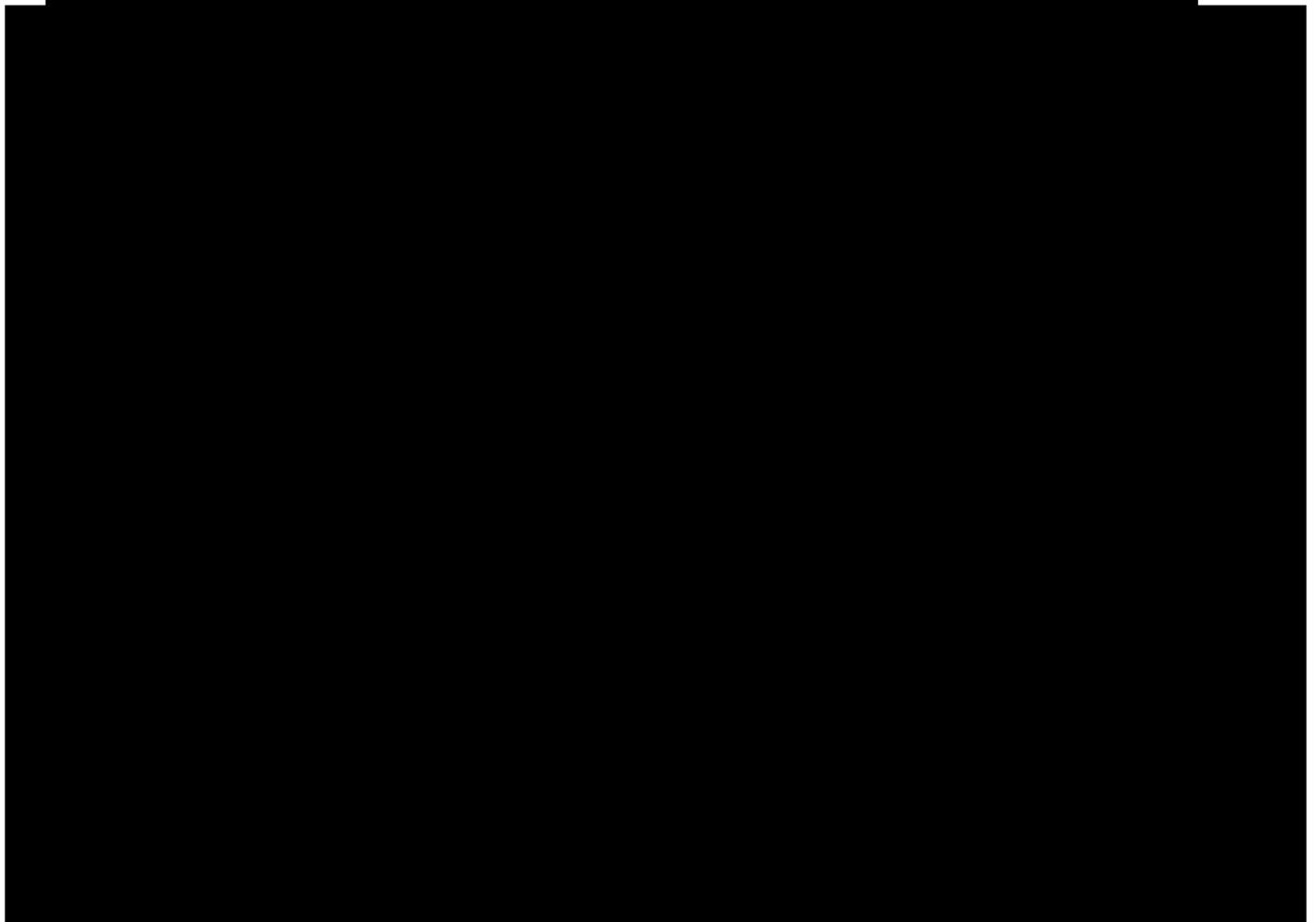
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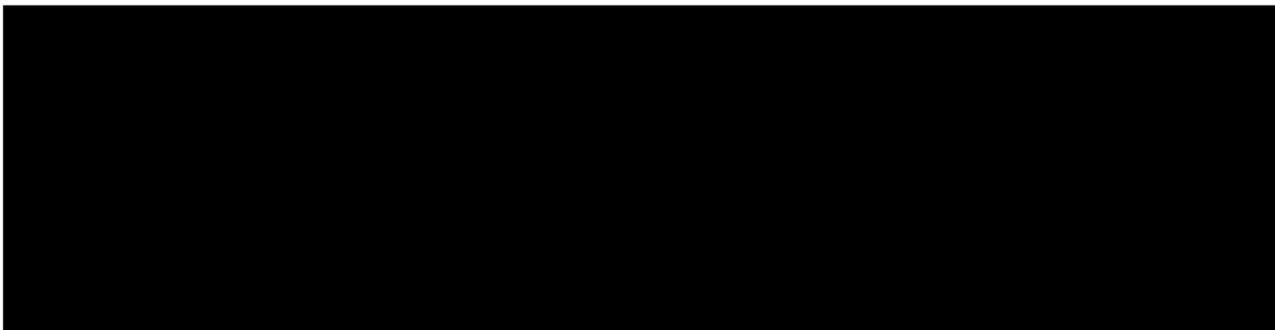
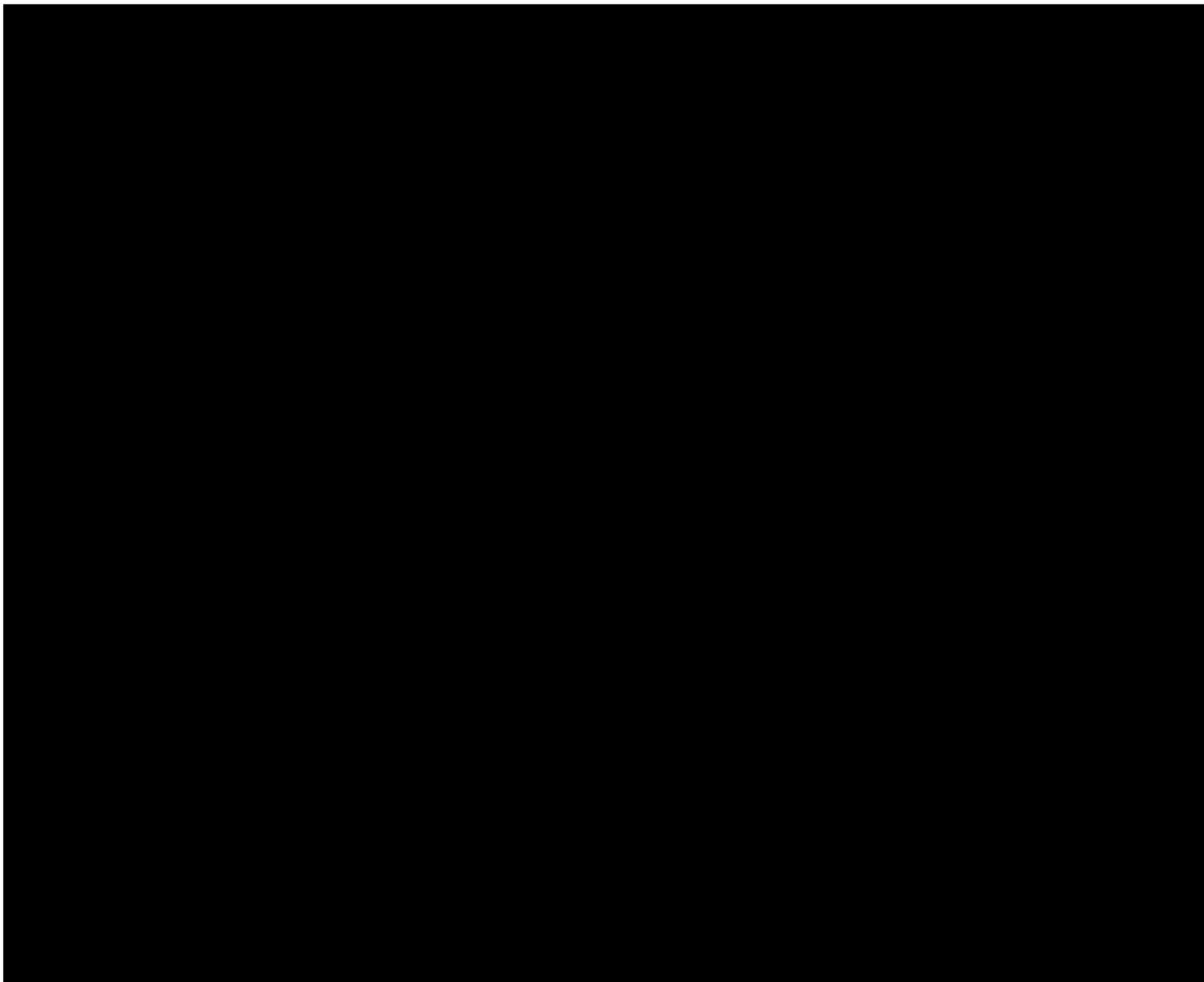
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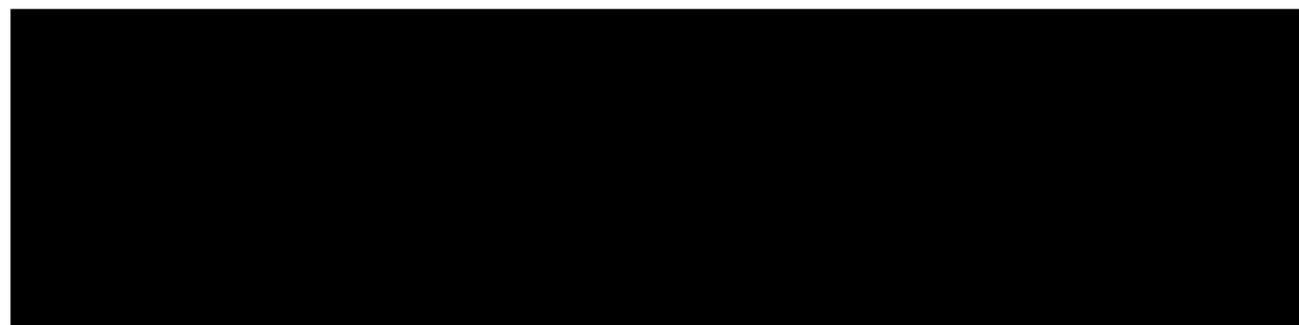
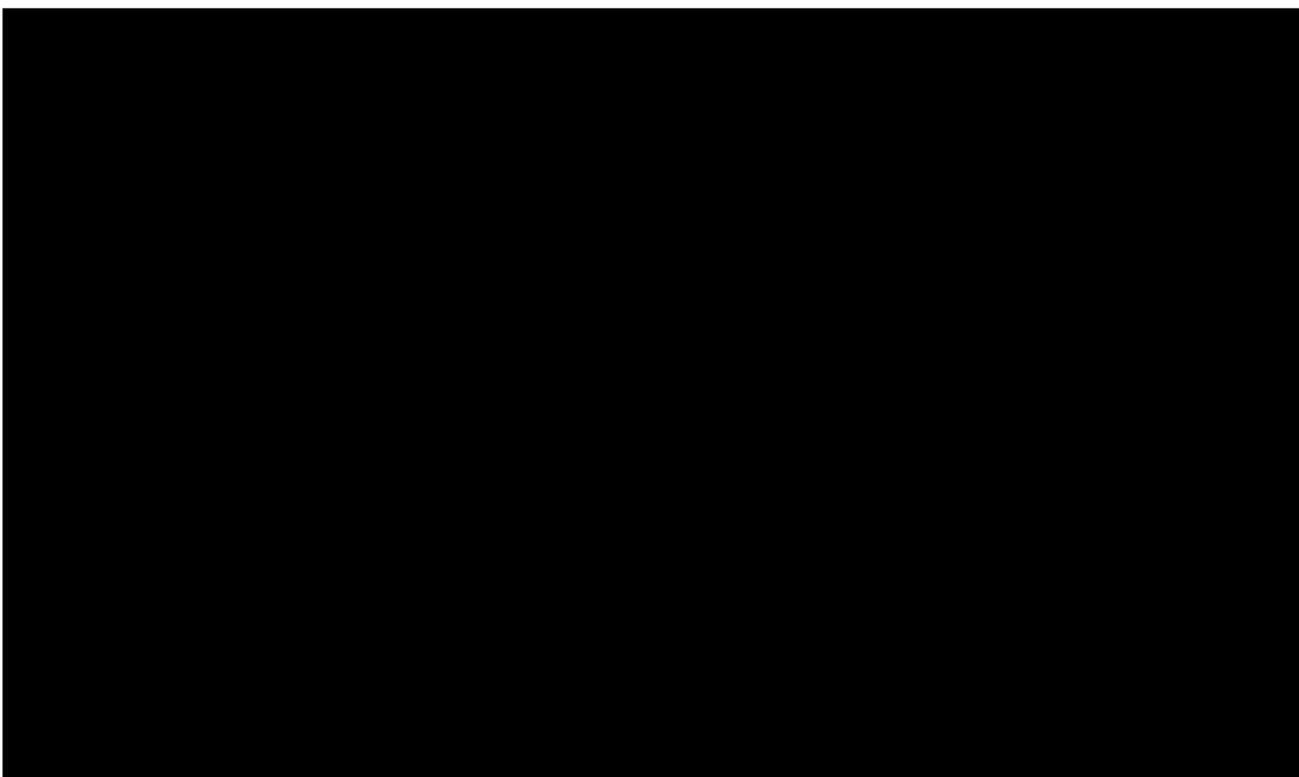
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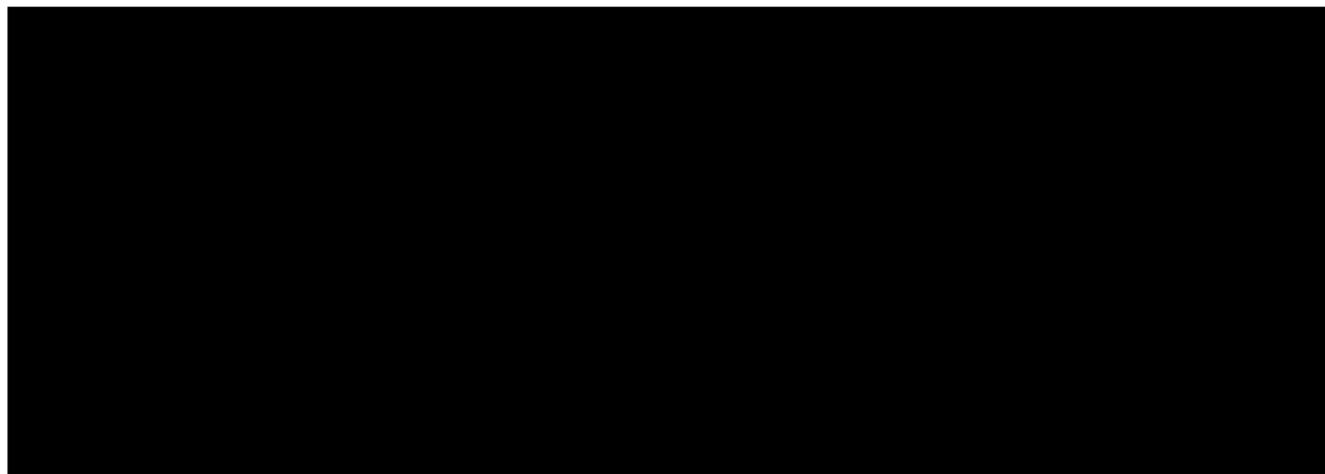
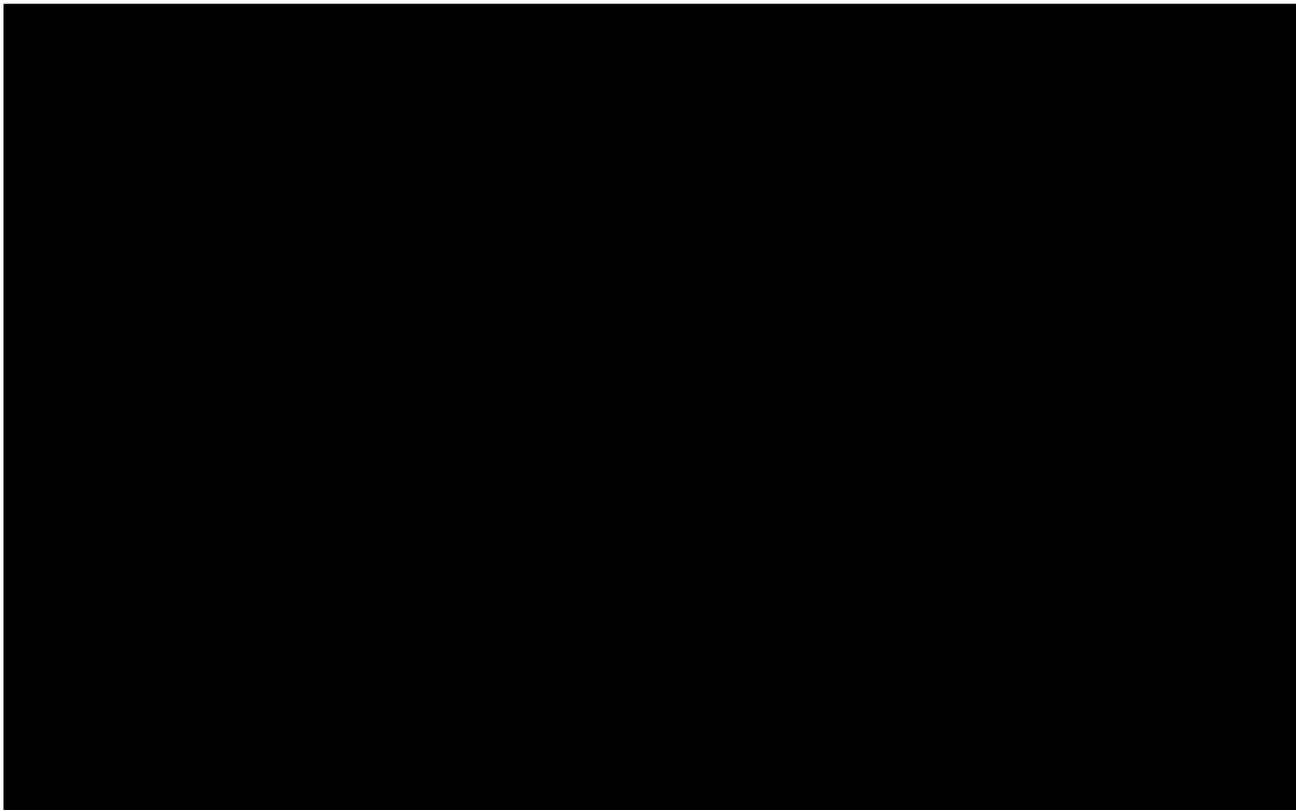
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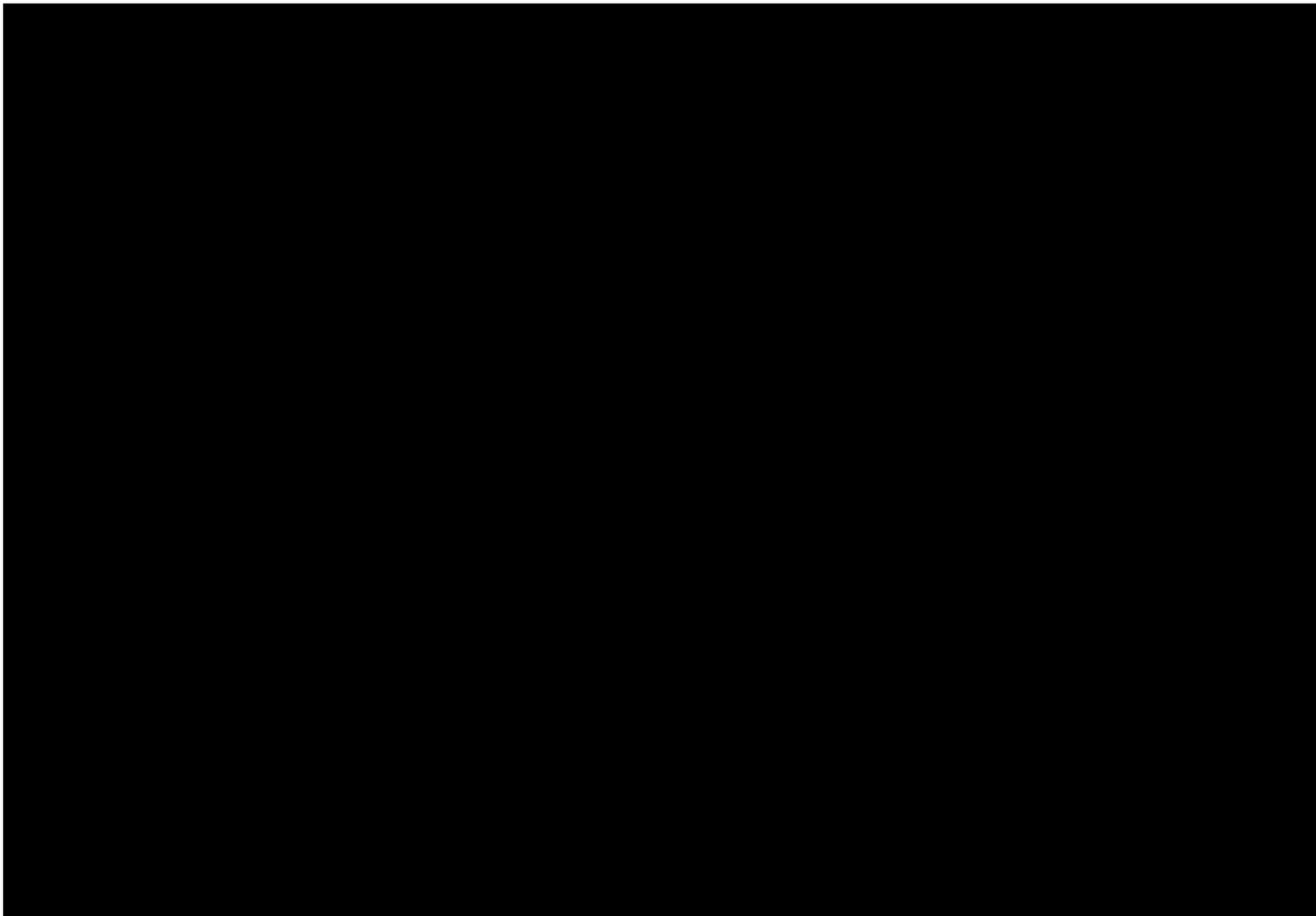
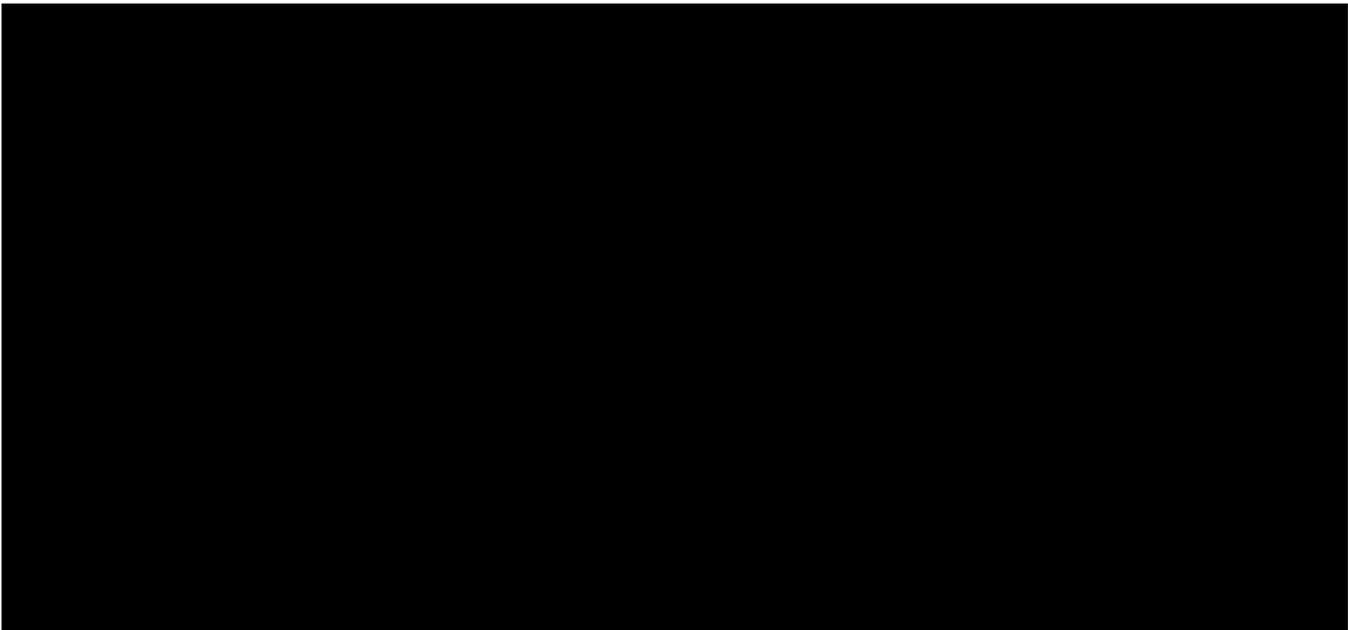
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**Guardiantrac, LLC
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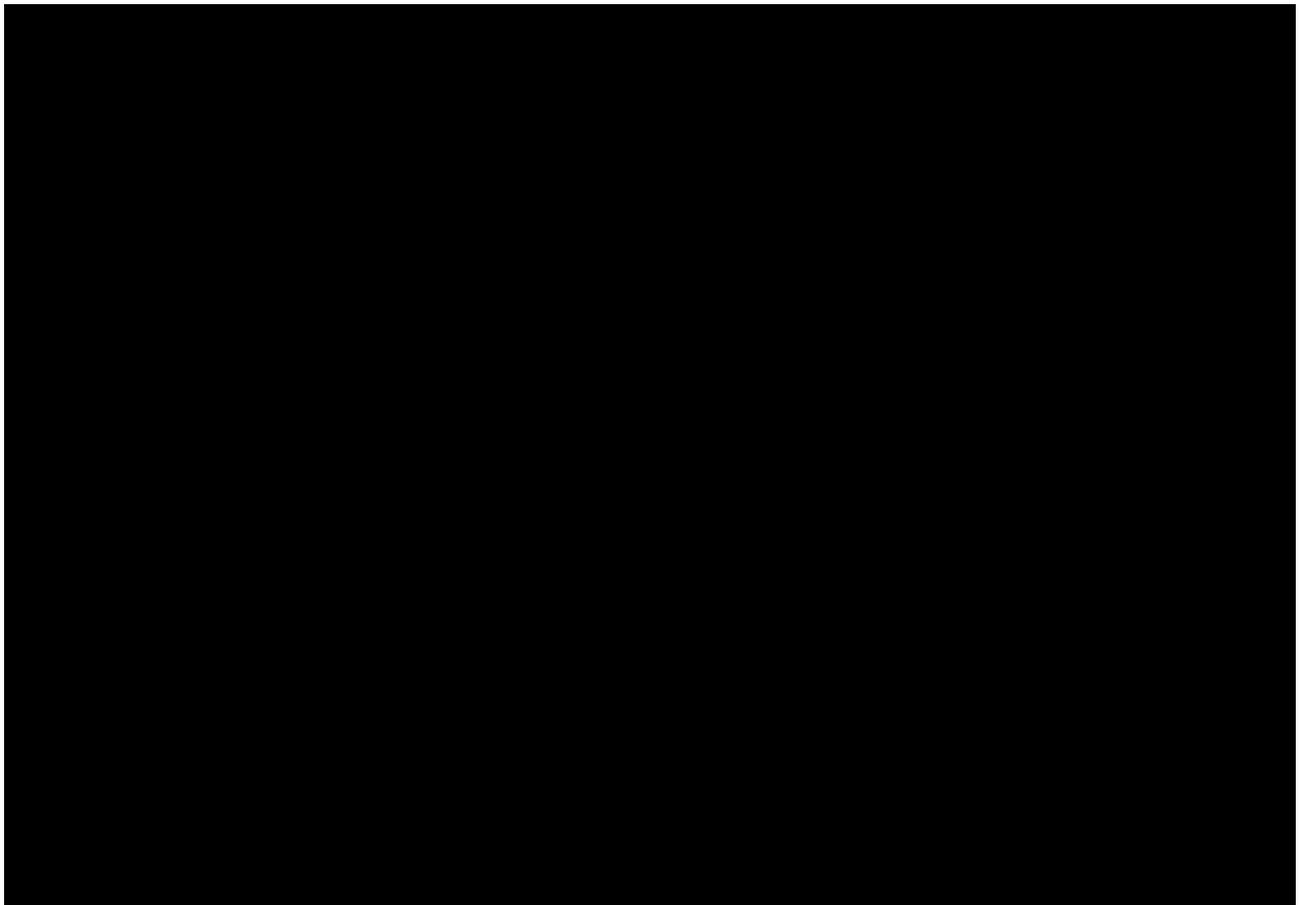
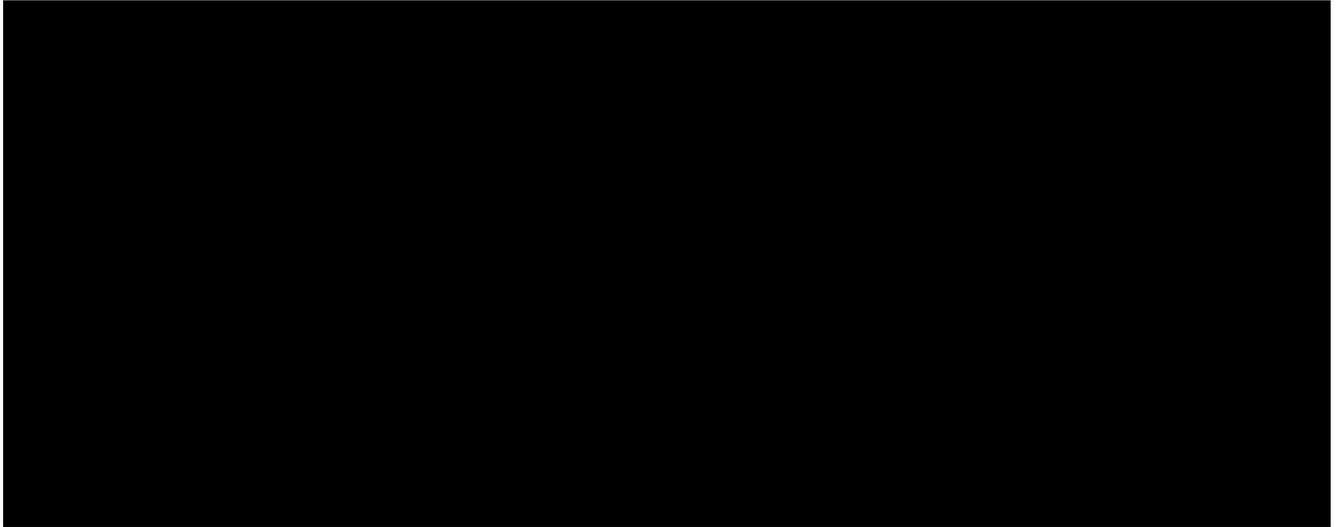
GUARDIANTRAC, LLC D/B/A GT INDEPENDENCE**Consolidated Financial Statements**December 31, 2016

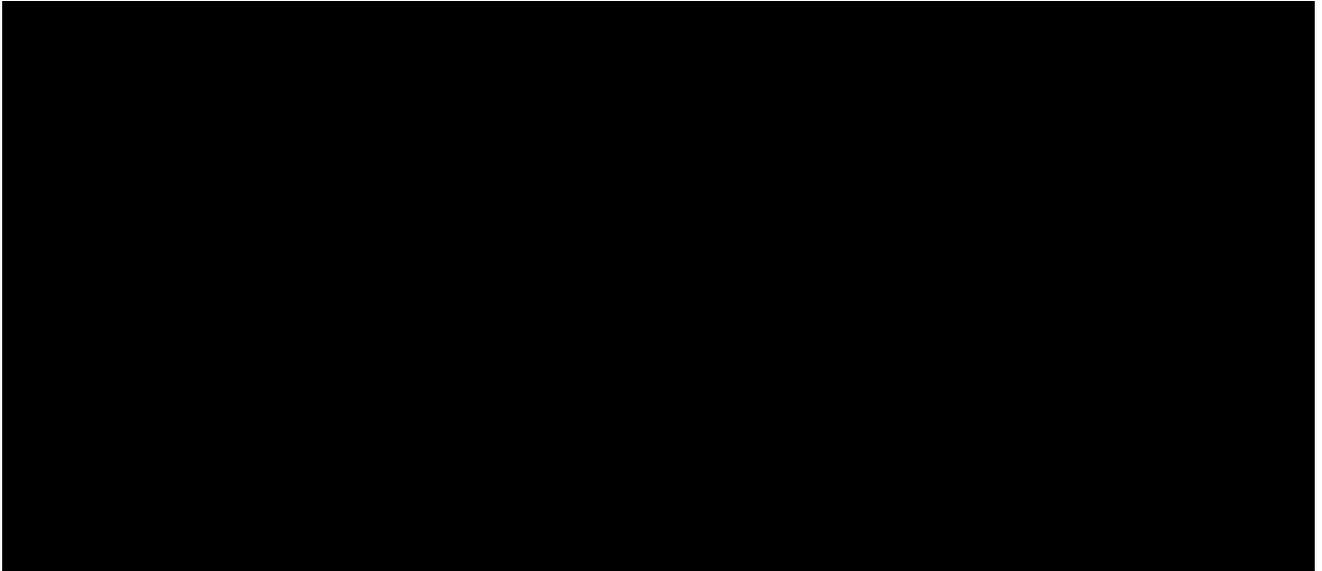
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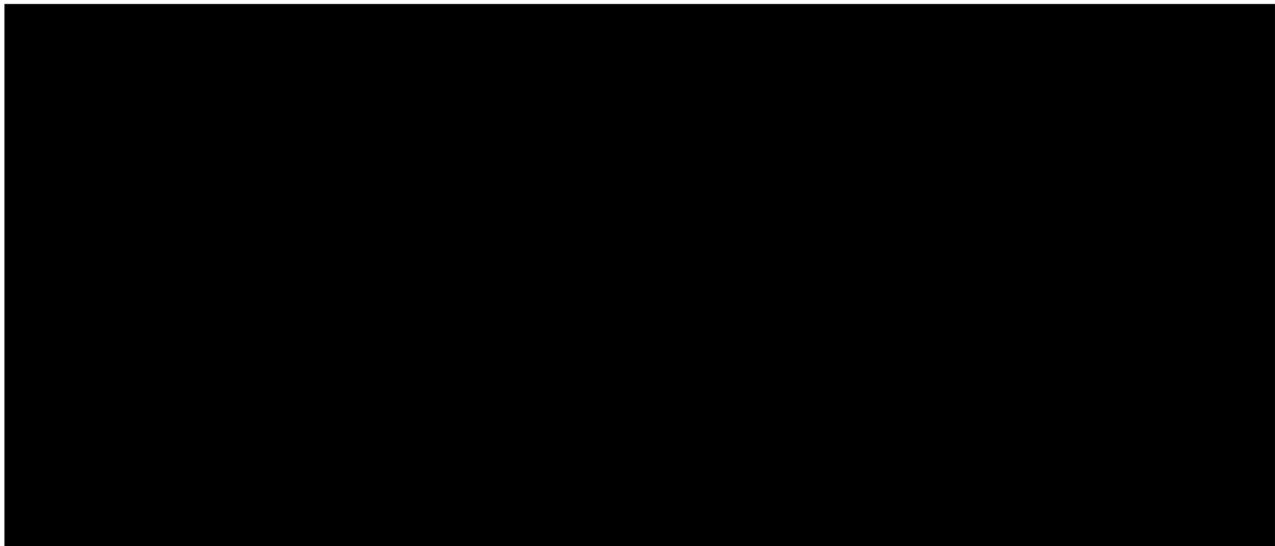
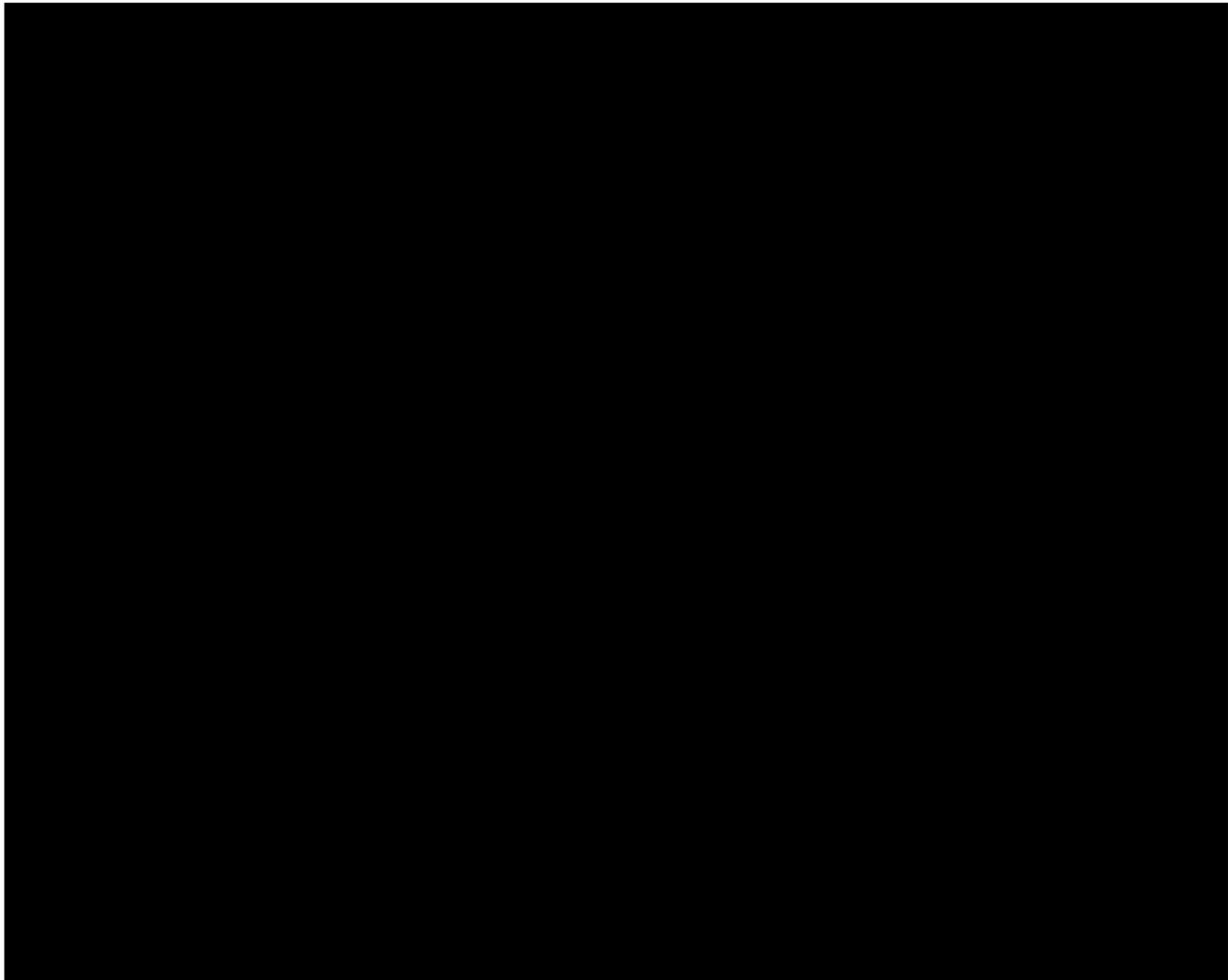
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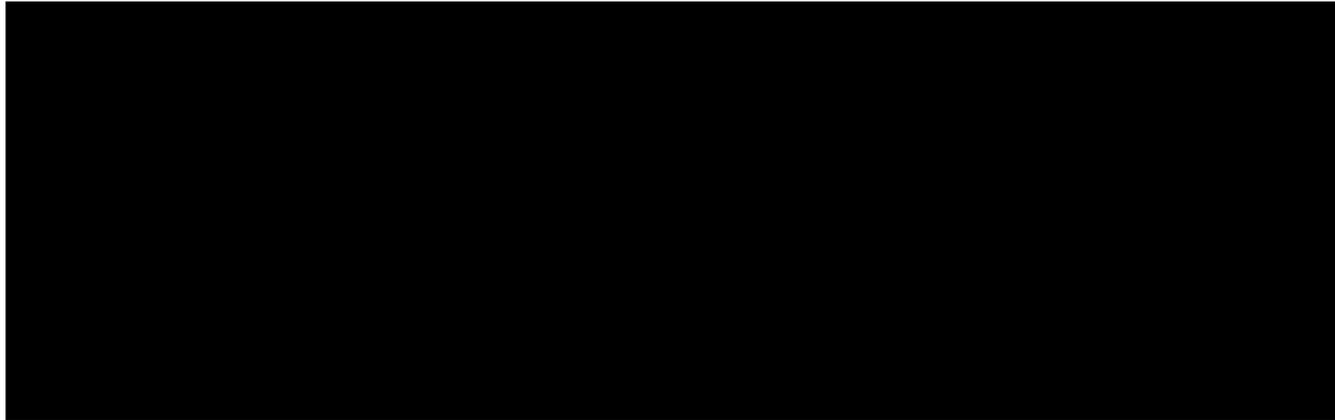
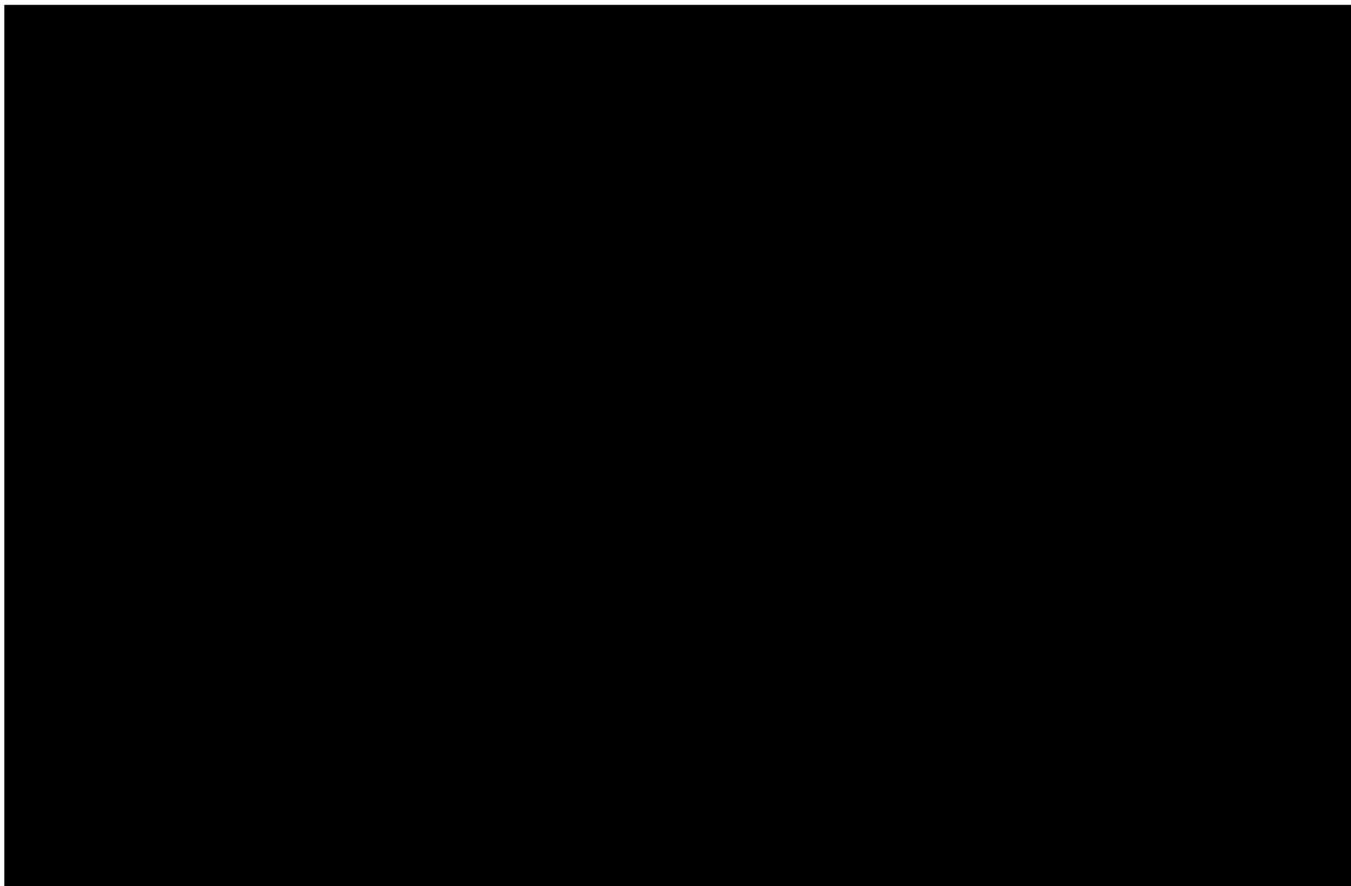
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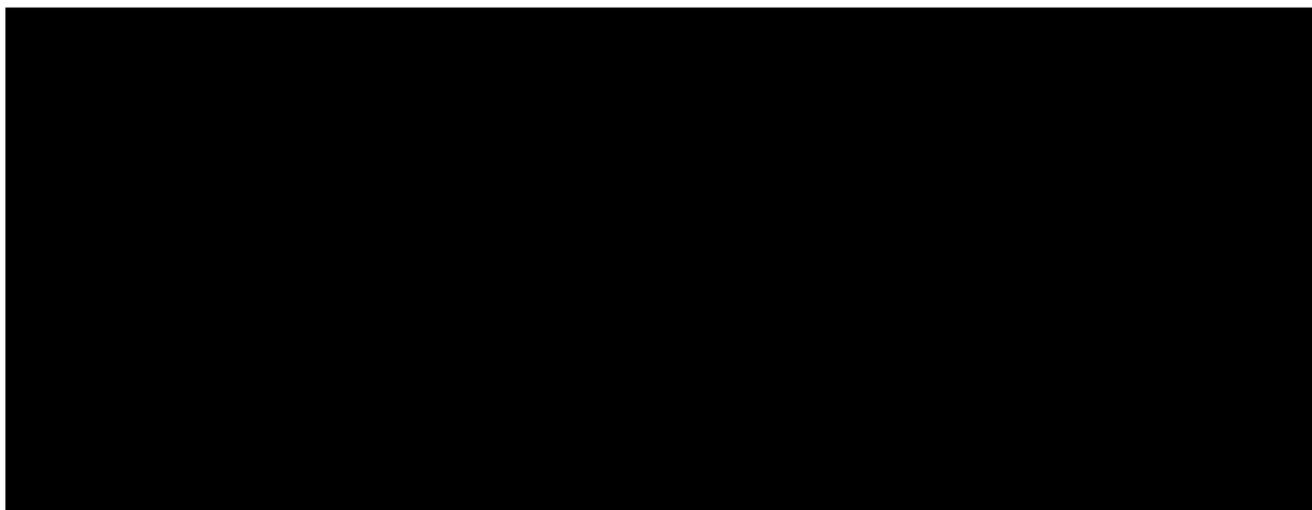
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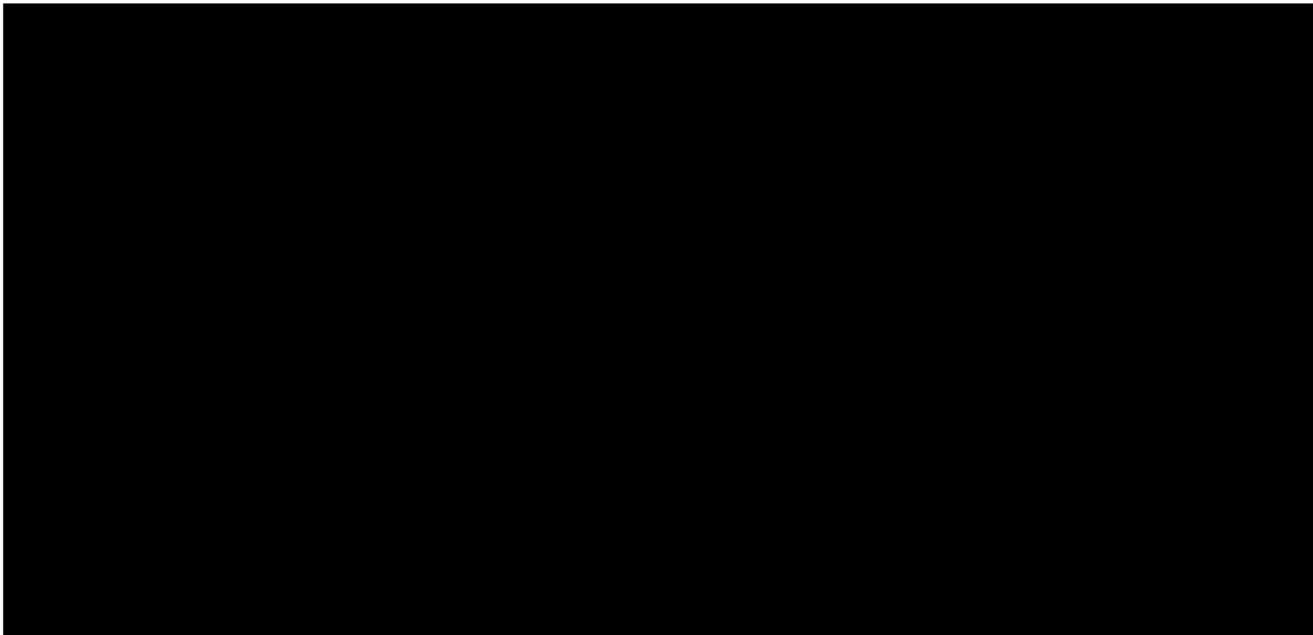
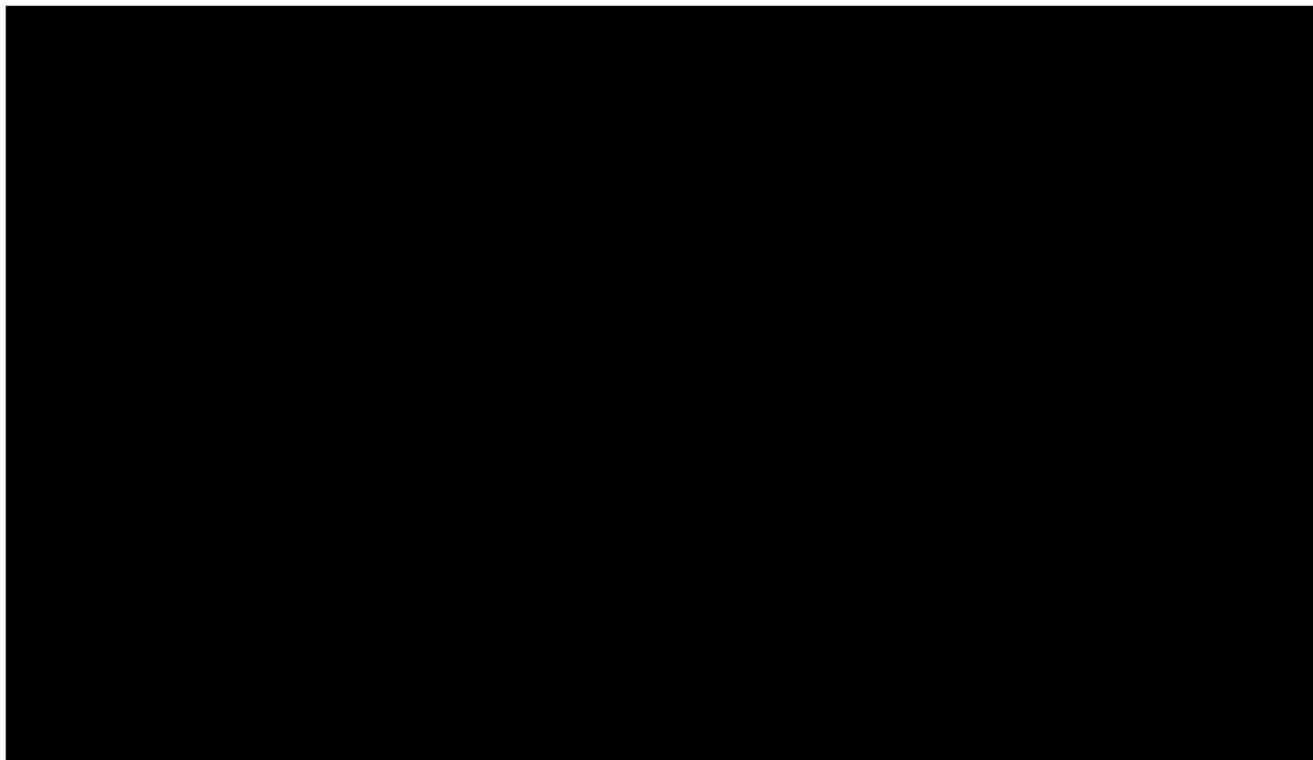
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See Notes to Consolidated Financial Statements.

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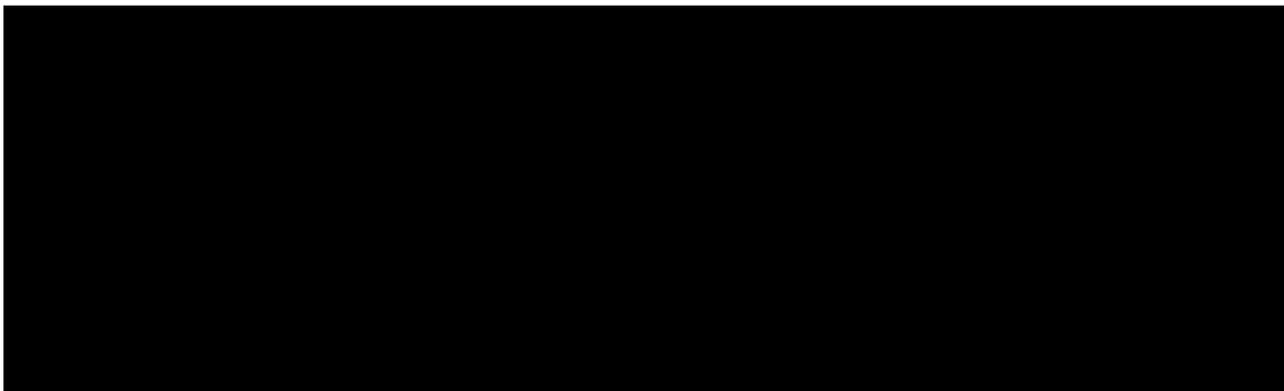


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GUARDIANTRAC, LLC D/B/A GT INDEPENDENCE

Consolidated Statement of Cash Flows (Continued)

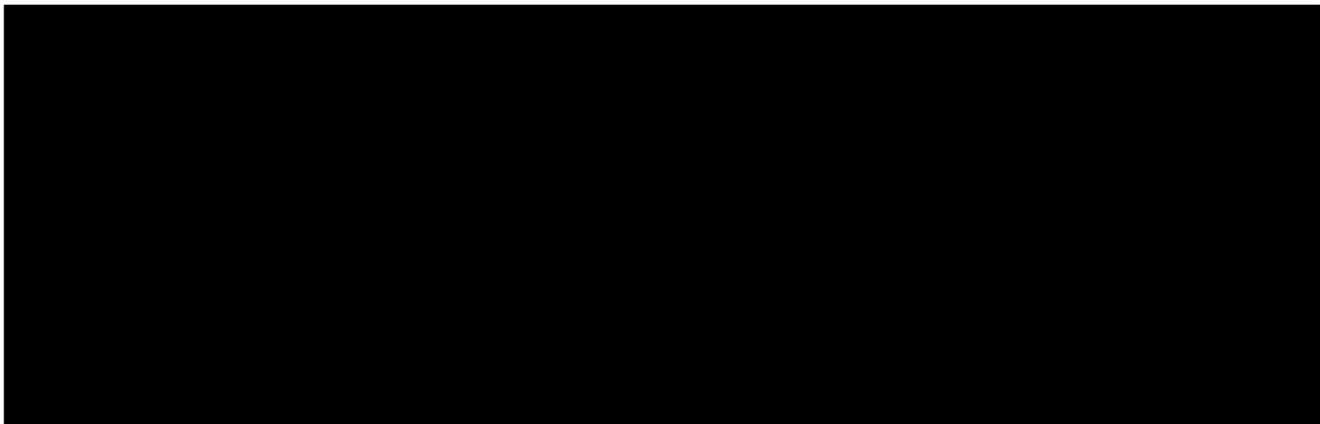
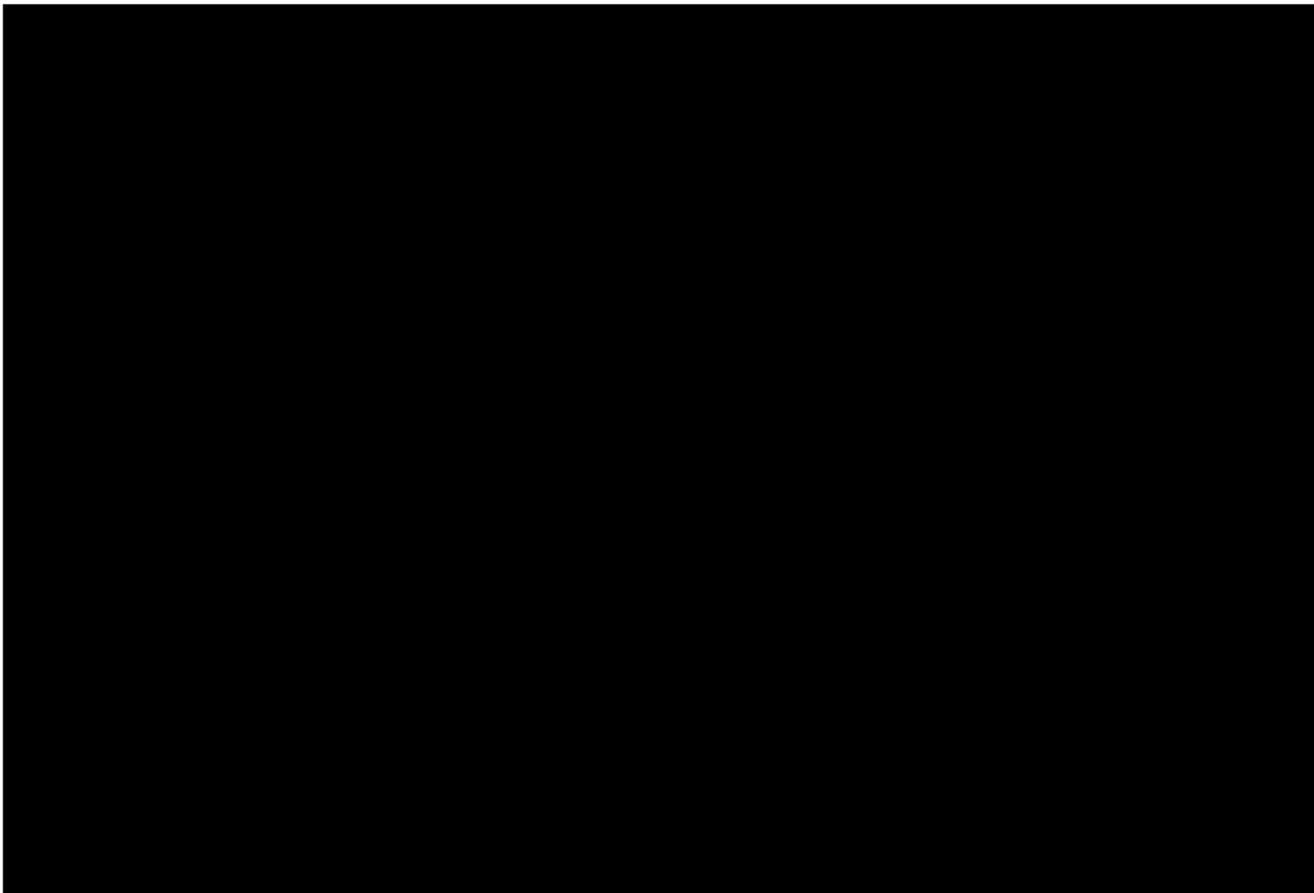
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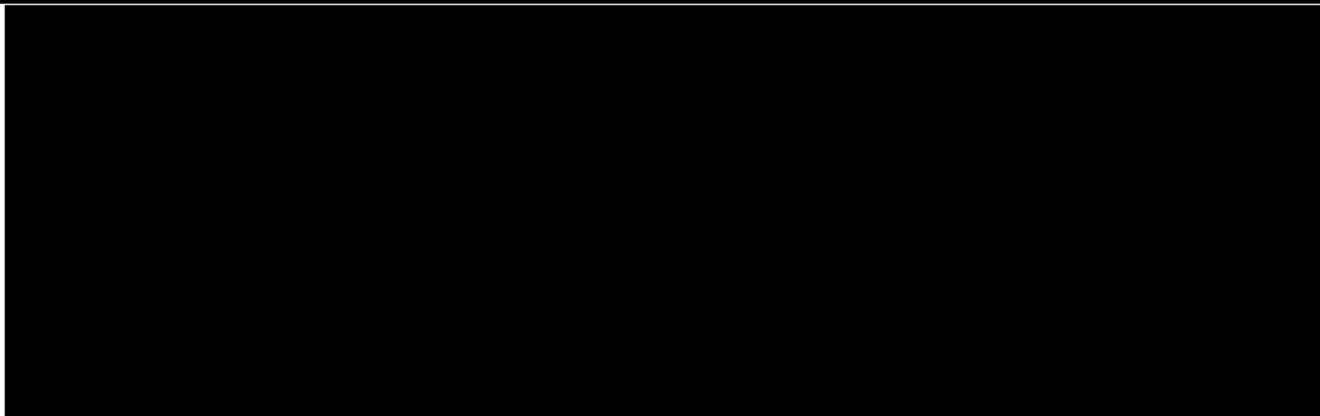
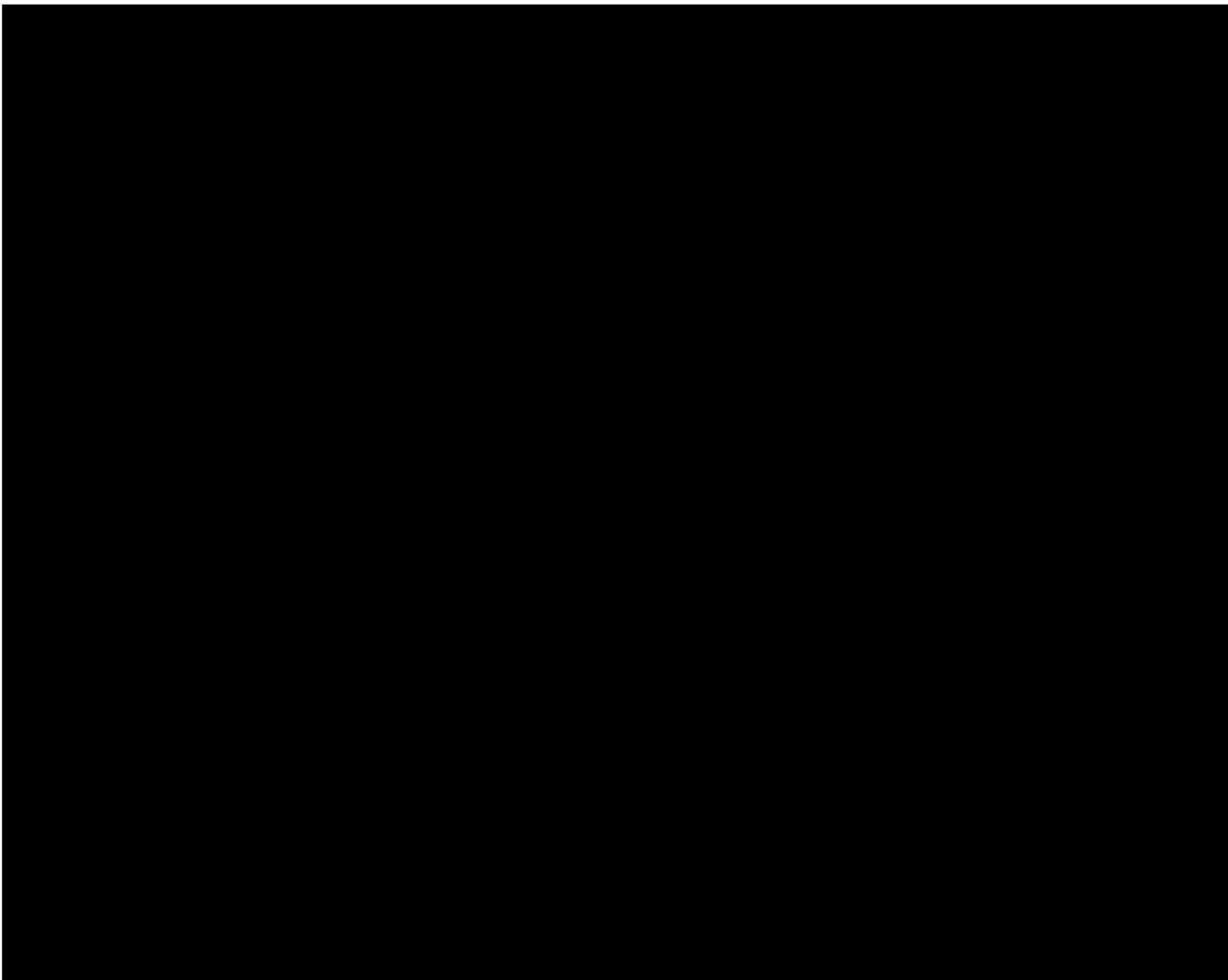
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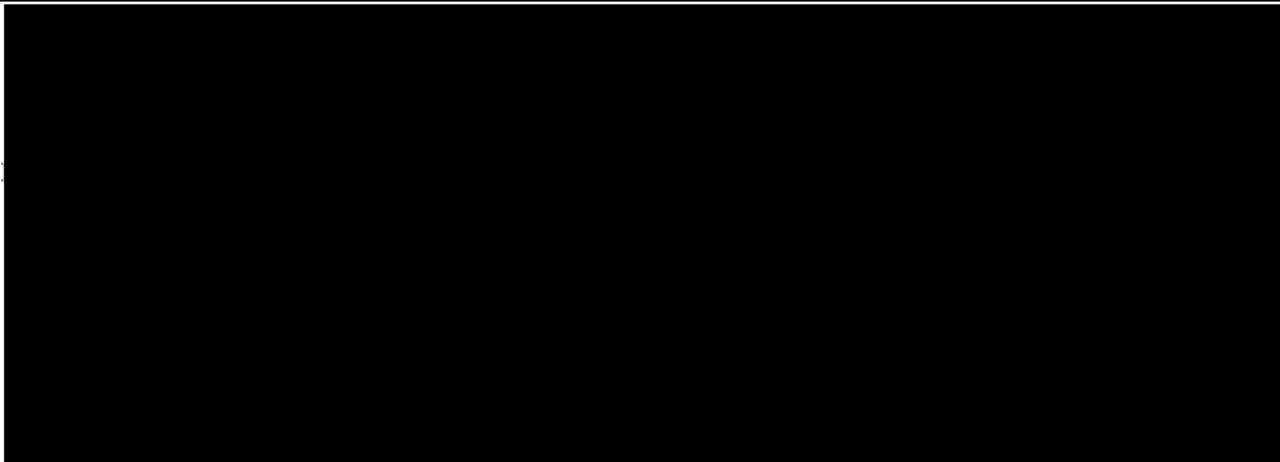
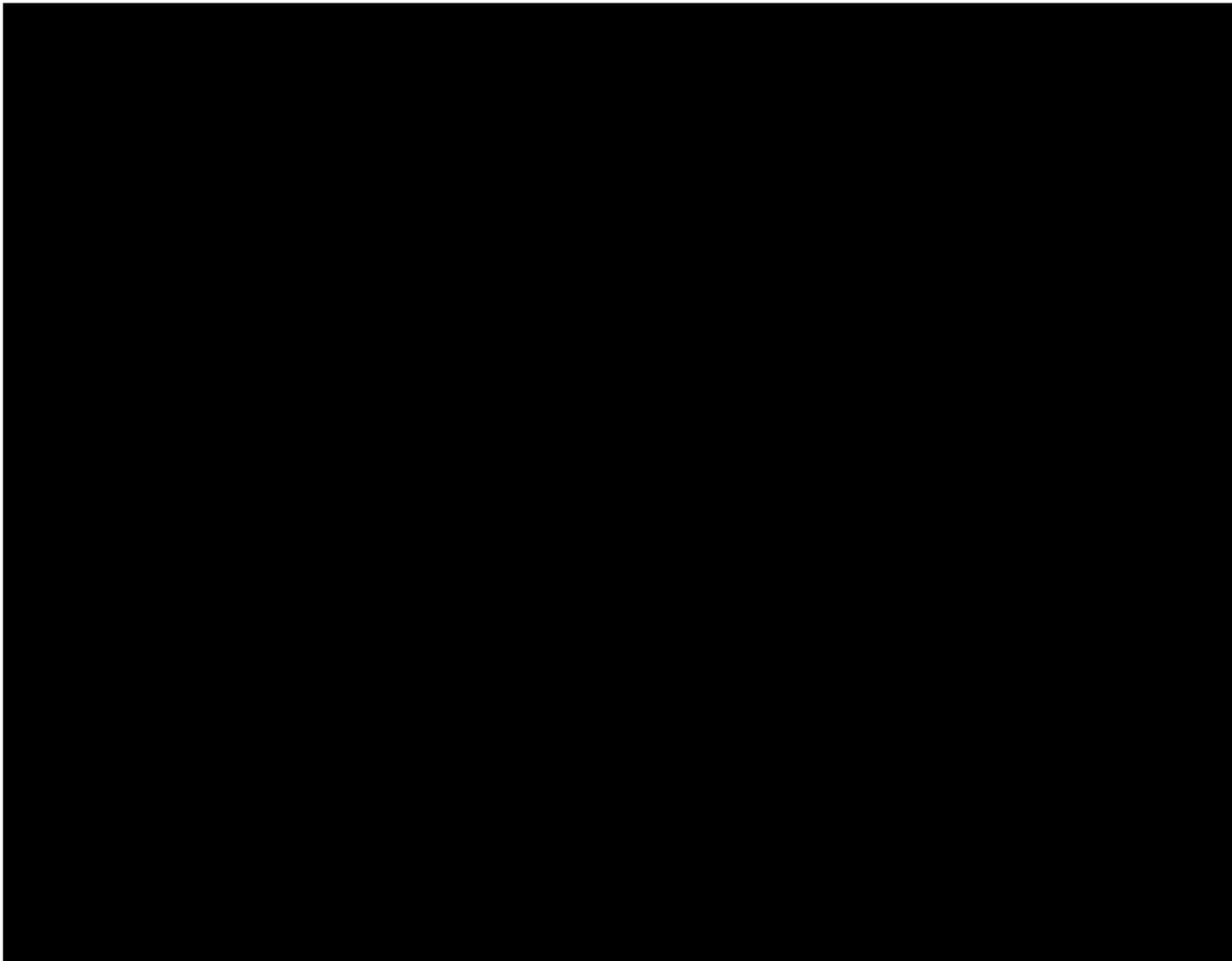
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Notes to Consolidated Financial Statements (Continued)

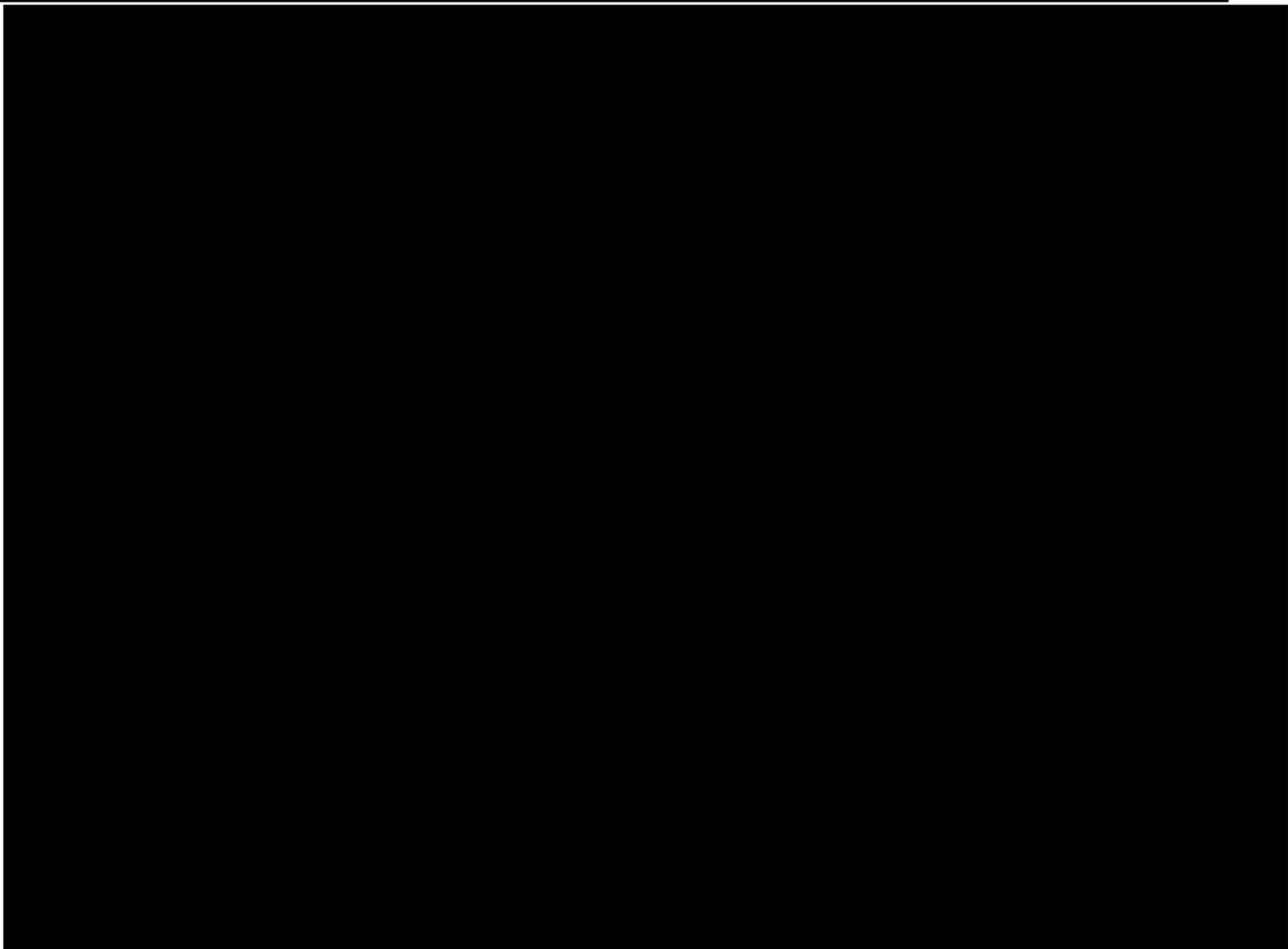
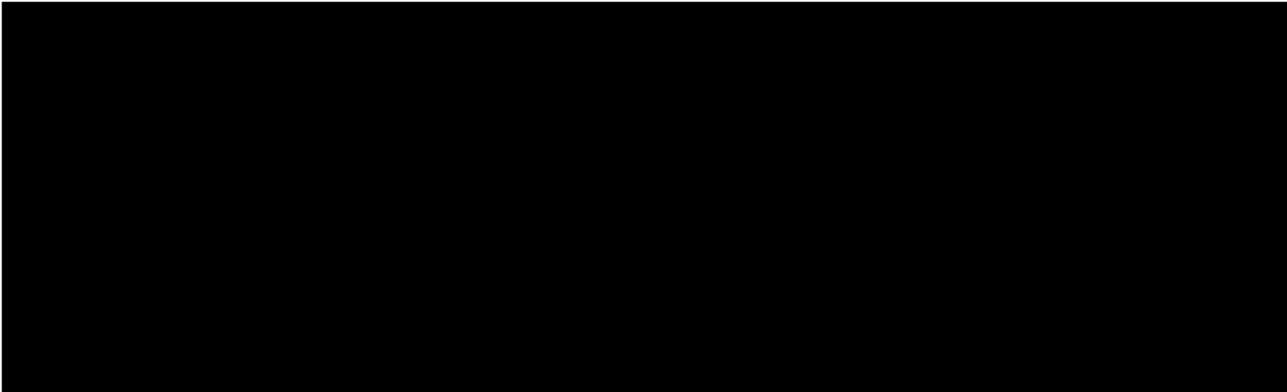
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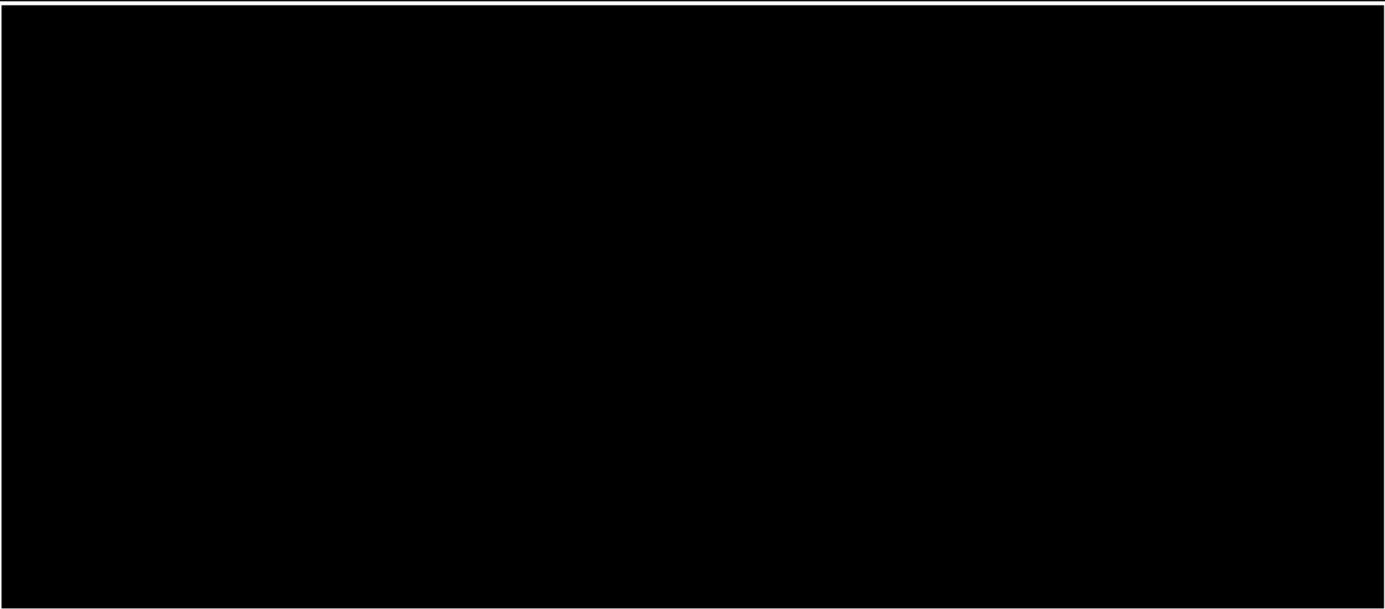
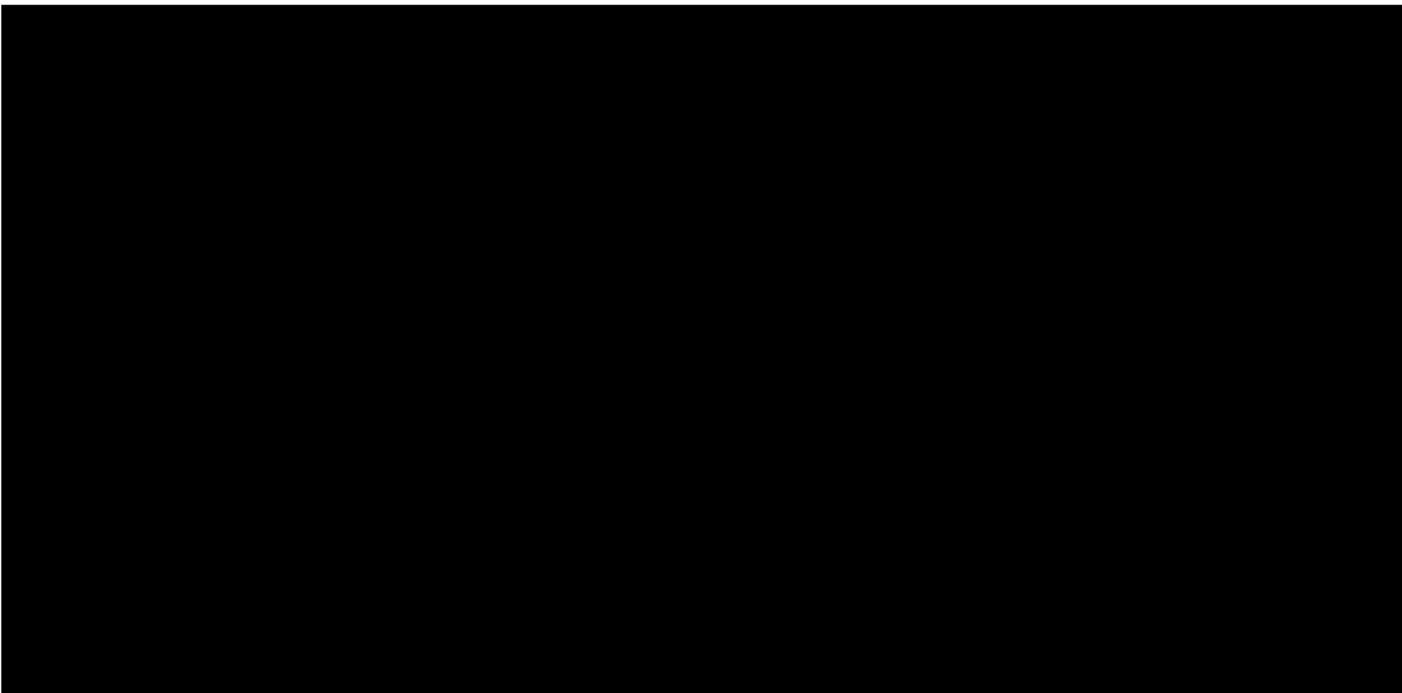
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Notes to Consolidated Financial Statements (Continued)

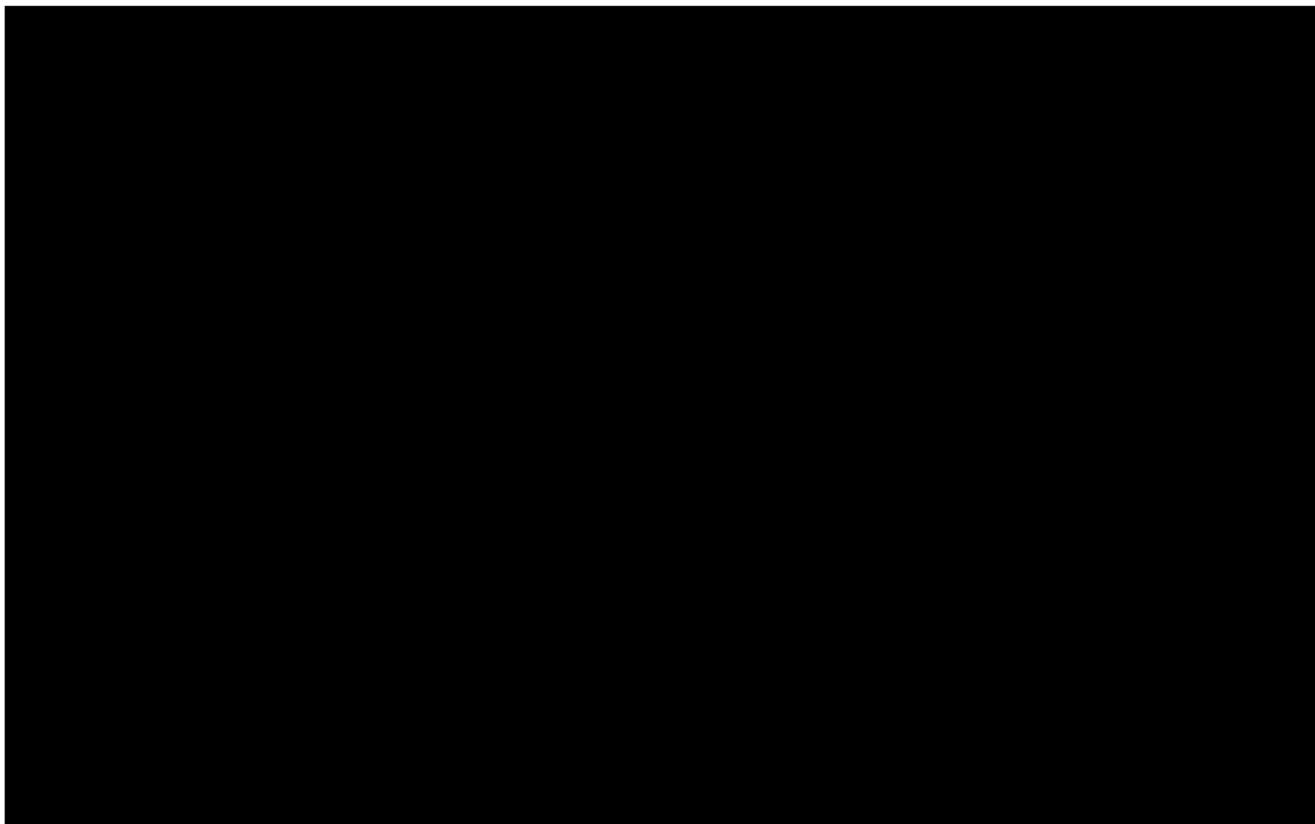
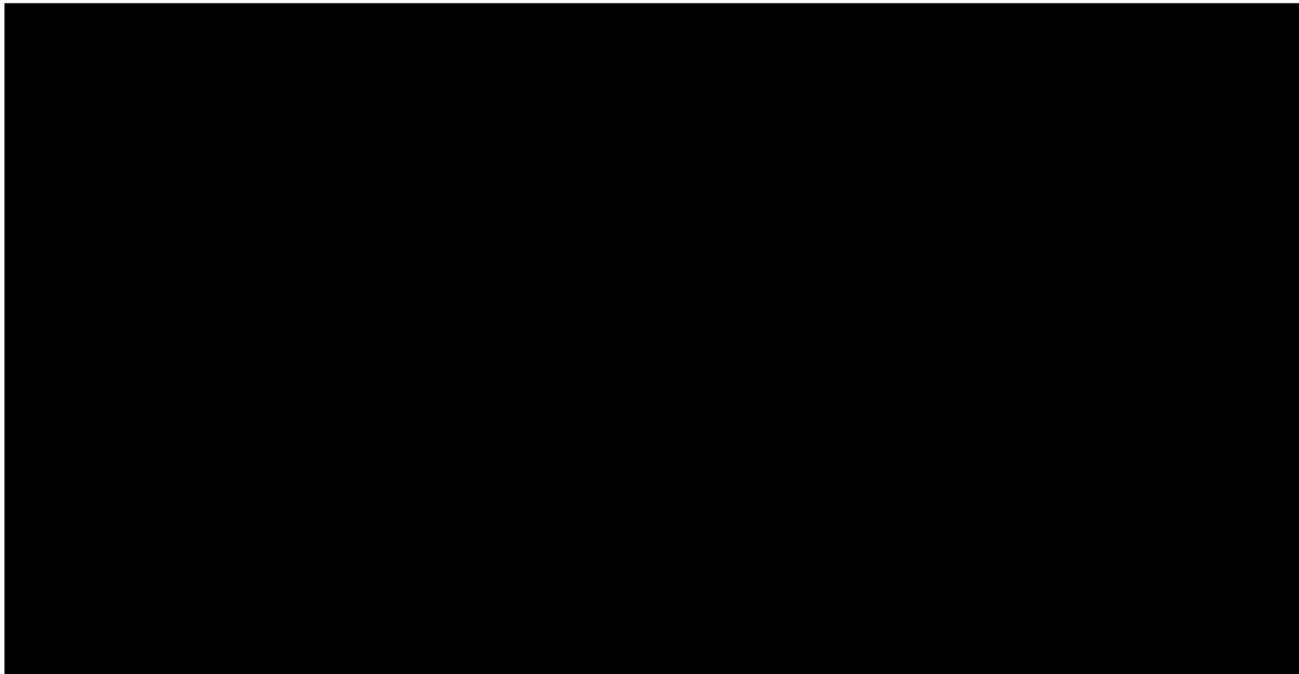
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Notes to Consolidated Financial Statements (Continued)

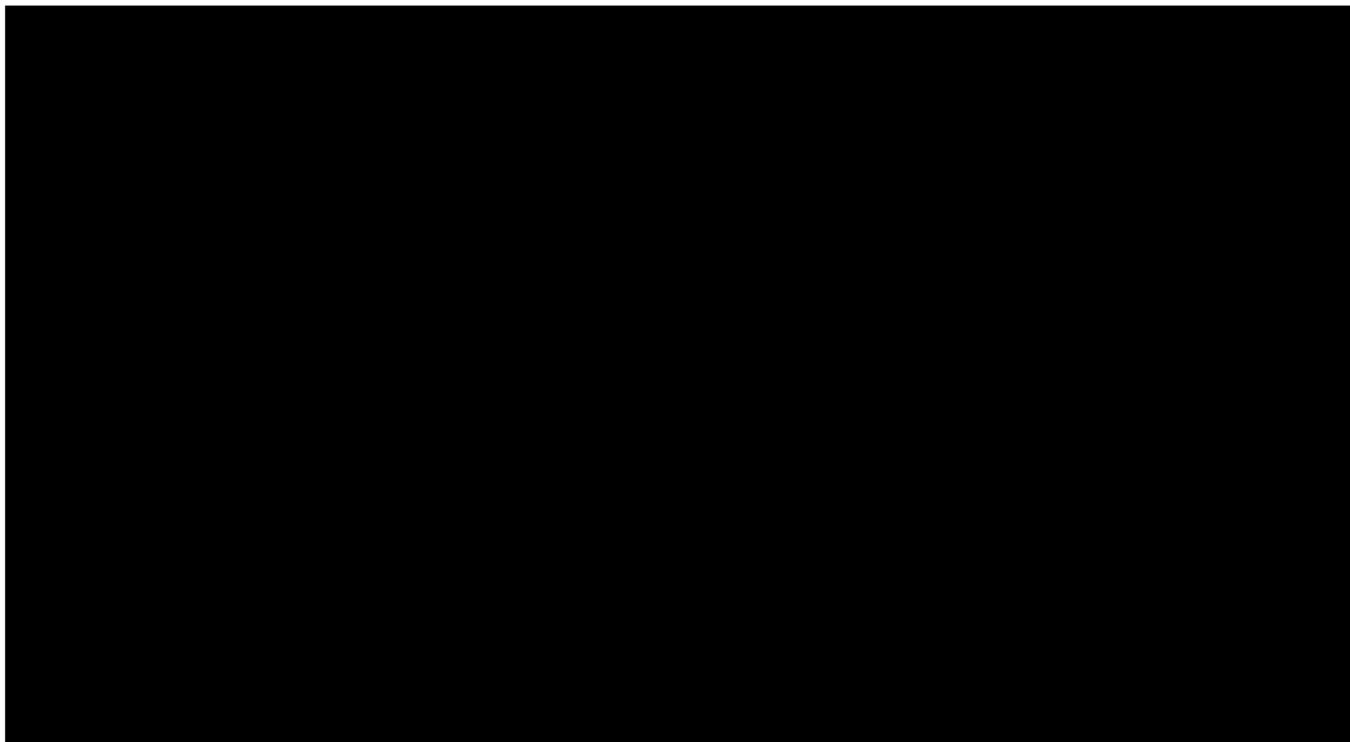
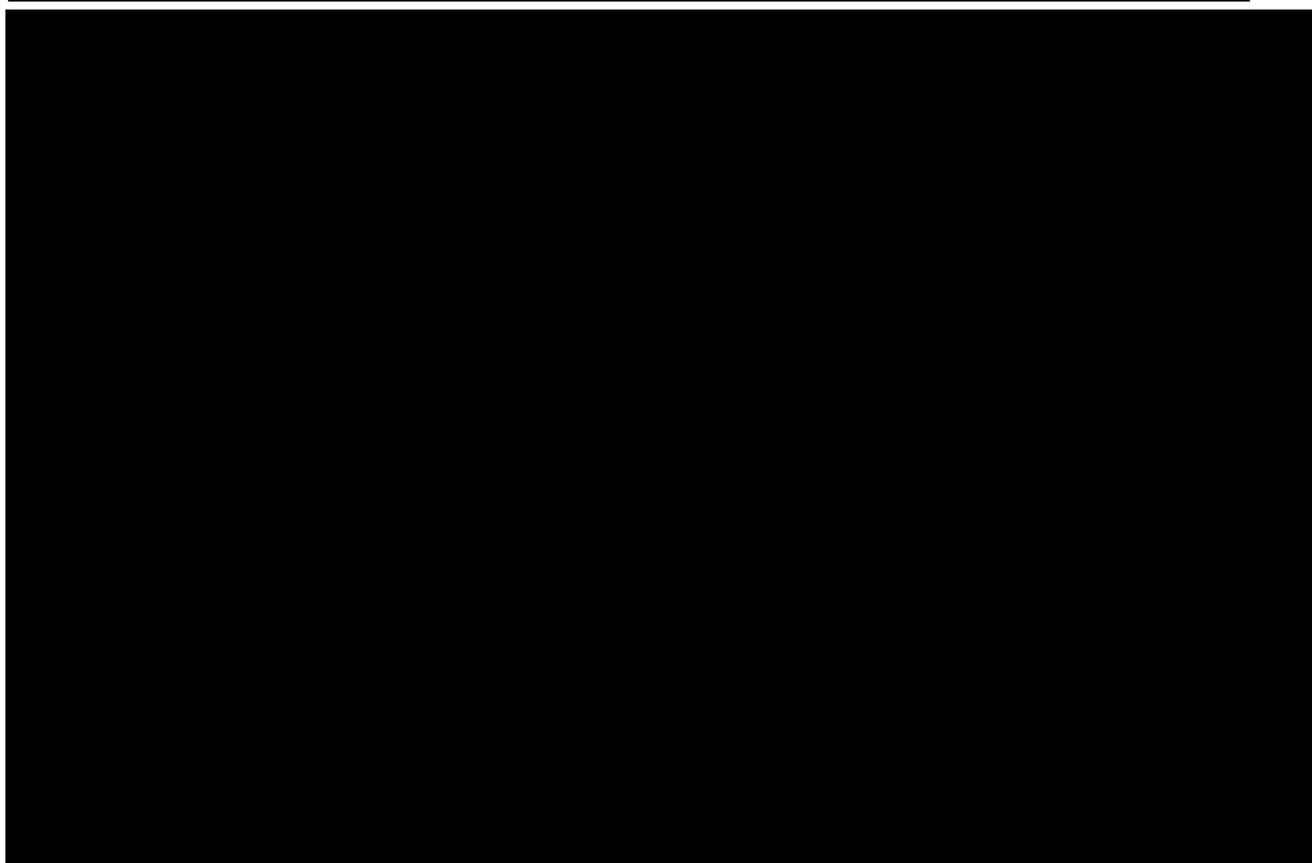
December 31, 2016



GUARDIANTRAC, LLC D/B/A GT INDEPENDENCE

Notes to Consolidated Financial Statements (Continued)

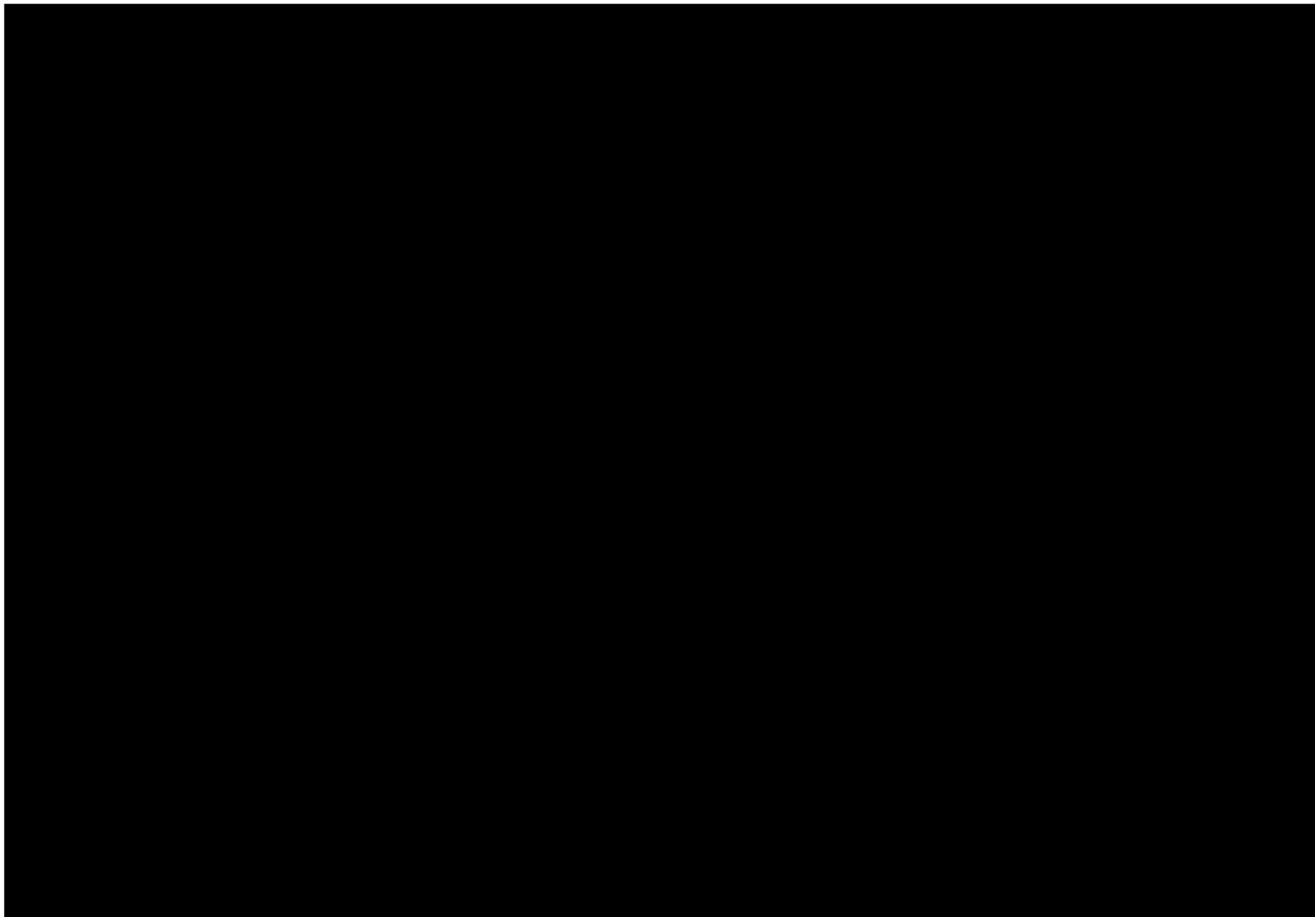
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GUARDIANTRAC, LLC D/B/A GT INDEPENDENCE

Notes to Consolidated Financial Statements (Continued)

December 31, 2016





KeyBank National Association

Mailcode: IN-27-02-0102

Commercial Banking Services

10 W Market Street, Ste 900

Indianapolis, IN 46204

July 11, 2017

To Whom It May Concern:

This letter is to notify you that GT Independence has been a client of KeyBank since 2013 and their business relationship is in positive standing.

Sincerely,

A handwritten signature in blue ink that reads "Cynthia A. Draeger".

Cynthia A. Draeger

Vice President

Relationship Officer Commercial Banking

KeyBank National Association

-
- I. PURPOSE: To establish policies and procedures for preparing monthly reports for self determination participants.
 - II. APPLICATION: All programs operated directly or under contract with Community Mental Health or other State Agencies
 - III. REFERENCE:
 - IV. DEFINITIONS:

Governmental agencies include but are not limited to Community Mental Health Agencies, Department of Human Services Agencies, Rehabilitation Services, County and State level Area Agencies on Aging. Self determination activities include those services provided by the contracting Agency included in the Self Determination budget submitted by the agency and the consumer.
 - V. POLICY:
 - A. GT Independence will prepare monthly reports for each active self-determination participant.
 - B. Reports will be simple, easy to read and understand.
 - C. Self-determination participants will be notified as to who is receiving the report.
 - D. Reports will be distributed not later than the 15th of the following month.
 - VI. PROCEDURE:
 - A. For each consumer, the Financial Services personnel will compare the Access database and the accounting software to assemble financial data in the format approved by the Chief Financial Officer.
 - B. The required format will be as follows: Sample Consumer Report.
 - C. Reports will be verified again for usage accuracy.
 - D. Reports will be mailed or made available on the Server for those designated to receive usage reports which include but are not limited to the Consumer and the Agency.
 - VII. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

GT Independence

I. PURPOSE:

To monitor, review and evaluate incidents, including critical incidents, which occur in the course of providing services and to enhance timely reporting and channeling of pertinent information to appropriate programs within the agency. This process also allows for monitoring the appropriateness of care provided, aggregating and reviewing critical aspects of care as they relate to quality improvement and to assure treatment issues are tracked, trends are identified, reviewed and reported so that they can be corrected.

II. APPLICATION:

All employees, contractors and volunteers of GT Independence

III. REFERENCES:

Reference:	Check if applies:	Standard Numbers:
42 CFR Parts 400 et al. (Balanced Budget Act)	X	438.10 (d)
45 CFR Parts 160 & 164 (HIPAA)	X	
42 CFR Part 2 (Substance Abuse)	X	
Department of Human Services Licensing Regulations	X	R400.14311
MCL PA 368 of 1978	X	333.21515
MCL PA 430 2004	X	330.1143a & 330.1143b (9) 330.1748 (9)
MDCH 1987 Administrative Rules	X	R330.7046

IV. DEFINITIONS:

Critical Incidents: Any event, occurrence, or condition which represents actual or potential serious harm to consumers and their families, visitors, volunteers, or staff members (including any medical emergencies). These include, but are not limited to:

A. All (Consumers, staff, volunteers, interns, visitors):

1. All incidents or accidents which involve a serious illness, injury, or serious health risks.
2. Use or possession of illicit drugs and substances in a program setting.
3. Use or possession of weapons in a program setting.
4. Any incident involving use of an emergency procedure.

B. Consumer related:

1. Attempted or completed suicide or homicide.
2. Death by any other cause.
3. Allegations of sexual or physical abuse/neglect.
4. Injuries or unexpected illnesses resulting in emergency medical treatment.
5. Serious adverse reactions to medications.
6. Use or possession of non-prescribed medication or substance in a program setting.

-
7. Abuse or neglect.
 8. All other incidents classified as Sentinel Events.
 9. Other events, occurrences, or conditions as specifically defined by GT Independence.

C. Property related:

1. All accidents involving an agency vehicle
2. All incidents involving loss, damage, or destruction of agency property of \$500.00 or more.
3. All fires.

D. Environmental/Safety related:

1. All incidents involving actual or potential serious safety or health risk to staff , visitors, or customers including:
 - a. chemical or biohazard related
 - b. facility/maintenance related
 - c. electrical related
 - d. theft or loss related
 - e. violation of procedures
 - f. equipment malfunction
 - g. security related
 - h. other observed safety risks

E. Infection related:

1. All cases involving an actual or potential serious infection exposure.

Major Permanent Loss of Function

Sensory motor, physiologic, or intellectual impairment not present upon intake requiring continued treatment of lifestyle change.

Root Cause Analysis

A process for problem solving and performance improvement by identifying the basic or causal factor(s) that underlie variation in performance (i.e., the root cause, including the occurrence or possible occurrence of a sentinel event). The process will institute solutions based on action plan implementation concerning the root cause.

Sentinel Event

An unexpected occurrence involving death or serious physical or psychological injury, or the risk thereof. Serious injury specifically includes loss of limb or function. The phrase “or the risk thereof” includes any process variation for which a re-occurrence would carry a significant chance of a serious adverse outcome.

V. POLICY:

It is the policy of the GT Independence that unusual and significant incidents (as defined below) involving active consumers/customers will be investigated in a timely manner, with appropriate follow up and/or remedial action steps taken to prevent reoccurrence. The Incident Reporting process is a retrospective peer review process to improve services or enhance treatment for clients. Any records, data and knowledge collected in this process are confidential; therefore this information is not available under the Freedom of Information Act (FOIA) or by court subpoena.

VI. PROCEDURES:

Incident -An incident for the purposes of this policy means an unusual or significant event that disrupts

or adversely affects the course of treatment or care of a consumer/customer. Unusual or significant events should be identified on an individual case by case basis and may be different based on individual consumer needs/treatment. Incidents may include but are not limited to: behavioral incidents, medication errors, physical intervention use, consumer death, etc.

1. All employees, contractors, or volunteers who witness, discover, or are notified of unusual incidents shall:
 - A. Take immediate action to protect, comfort, and arrange for emergency medical treatment as necessary if the consumer has sustained an injury.
 - B. Immediately, verbally notify the appropriate supervisor and attending medical staff of any apparent serious injury, medication error or unexplained injury.
 - C. Complete the Incident Report (IR), ensuring that all information is filled in completely, and give report to program supervisor as soon as possible, but no later than the end of the shift in which the incident occurred
 - D. The form may be completed on paper.
 - E. Only one IR should be completed per consumer event. Other consumers involved or staff present should be noted in the appropriate space on the IR form.
 - F. All employees, contractors, or volunteers will also adhere to reporting requirements of 1982 Public Act 591, Adult Protective Services Act, 1975 Public Act 238, as amended, Child Protection Act and 1998 Public Act 32, Mandatory Report of Abuse Act, and the Sentinel Event Reporting Requirements. (See Abuse and Neglect Policy and Sentinel Event Policy.)
 - G. Staff of some programs (i.e. day programs and residential services) should familiarize themselves with applicable procedures for reporting certain types of incidents to the appropriate licensing or regulatory bodies (Social Service Agency, OSHA, etc.) A copy of the report will be attached to IR form and submitted for internal processing in accordance with this policy.
 - H. Staff must report any known or suspected Recipient Rights Issue immediately but no later than the next business day.
 - I. Case managers are to be verbally notified within 24 hours of the incident and provided with a copy of the report.
 - J. Statistical information logged for each IR will be aggregated and reported quarterly or more frequently via the Performance Improvement Process. The PI Committee is responsible for identifying any agency trends and opportunities for systems improvement.
 - K. Scanned or electronically entered IRs will remain in electronic format indefinitely. Originals should be shredded.
 - L. Incident Reporting is considered a peer review activity and, as such, will not be made a part of the client case record.
 - M. All related records, data and knowledge, including minutes collected for or by individuals/committees assigned a peer review function, are confidential, are not public record and, therefore:
 1. Do not appear in the client record;
 2. are not subject to court subpoena pursuant to MCL333.21515, MCL331.521, MCL331.533;
 3. disclosure or duplication of Incident Reports is absolutely prohibited except as provided in this policy;
 - N. The reporting of incidents as described in this policy is a peer review function to improve the

quality of client care. IRs and the information contained therein is confidential and will be circulated only to staff with a need to know.

2. The following items are typically considered reportable incidents for the sake of this procedure:
- A. RECIPIENT RELATED:
 - 1) Medication - Errors of administration, adverse reaction, inappropriate usage, inappropriate storage
 - 2) Behavioral - All incidents which involve the usage of staff physical intervention/assaultive or combative behavior/self-abuse which results in injury/destructive behavior resulting in damage to property
 - 3) Neglect - Issues of neglect/adequacy of care
 - 4) Abuse - Issues of customer abuse (includes physical/verbal/sexual)
 - 5) Confidentiality - Incidents where consumer confidentiality
 - 6) Health Related - Incidents where the customers health would be involved
 - 7) Injury/Accidents - Incidents where injury to consumer is observed; or incidents or accidents in which no injuries to consumer are observed
 - B. PROPERTY RELATED:
All incidents or accidents involving loss, damage, or destruction of GT Independence property and employee property.
 - C. GT Independence EMPLOYEE RELATED:
All incidents or accidents which involve staff illness, injury, potential risk to health, or vehicular accidents while using personal vehicles. Note that in addition to the incident report, if there is any possibility that a worker's compensation claim may be filed, either immediately or at some time in the future, refer to Operating Procedure: Worker's Compensation Claims, and complete "Employer's Basic Report of Injury."
 - D. OTHER:
 - 1) Environmental/Safety Related - All incidents involving actual, or potential safety risk to staff, visitors, or customers including: Chemical related, Facility/Maintenance related, Electrical related, Theft or loss related, Violation of procedures, Equipment malfunction, Security related, or other observed safety risk.
 - 2) Infection Related – All cases involving actual or potential infection exposure.
 - 3) Employee of another agency or provider.
3. Action Following Recipient Related Incidents:
- A. Staff Members shall:
 - 1) Take appropriate action when personally involved in an incident.
 - 2) In the case of a severe adverse incident, which includes a customer suicide or attempted suicide, homicide or attempted homicide, serious injury or death by any means, immediately contact (a) Immediate Supervisor (b) Safety Officer and (c) Director and/or CEO
 - 3) In other incidents, that are not severe or adverse, report verbally to immediate supervisor any incident which seems to merit administrative action.

-
- 4) Complete a written Incident Report within 24 hours of which an incident occurs, using instructions.
 - 5) Forward written Incident Report to Immediate Supervisor.
4. Supervisor:
- A. Assures that the form is filled out completely and accurately.
 - B. Initiates follow-up action as recommended and appropriate.
 - C. Forwards the form to the Quality Improvement and Compliance Manager within 24 hours of receipt.
5. Quality Improvement and Compliance Manager:
- A. Review and act upon all verbal or written Incident Reports in a timely and appropriate fashion.
 - B. Separate incidents which involve the customer as the person at risk or injure from those incidents involving risk or injury to the employee, property damage, and environmental safety related.
 - C. Those incidents that involve the employee or property related incidents, and environmental safety related incidents are forwarded to the Safety Committee.
 - D. Add any additional, relevant comments to the Incident Report.
 - E. Assure that Incident Report is sent to appropriate referring agency when necessary.
 - F. Maintain a cumulative file of Incident Reports.
 - G. Take necessary action, when appropriate, to ensure prevention of incidents which may include education or training.
6. Staff and property related Incidents
- A. Staff shall immediately report any work-related injuries to their immediate supervisor prior to completion of the Incident Report.
 - B. Staff shall immediately report any incident with damages to Agency property or equipment to their immediate supervisor prior to completion of the incident report.
 - C. Staff shall immediately report any accident while using their personal vehicle to their immediate supervisor prior to completion of the incident report.
7. Safety Committee
- A. Safety Committee will review incident reports that involve employee, environmental safety, vehicular accidents, and property related incidents.

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- B. Safety Committee will keep leadership informed of any trends in those incidents.
8. Michigan Agency with Choice Specifications
- A. Upon kick off, the field representative will go over the incident reporting procedure and provide staff with the forms.
 - B. Additional forms will be available by contacting the Director and requesting them.
 - C. If an incident report is completed, it must be faxed to the Director within 24 hours of the incident for review and completion.
9. The Quality Management Committee will review critical incidents on an annual basis to review trends, root causes, and implement necessary improvements into the Performance Improvement Plan which may include prevention, education, and training requirements.

VII. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

I. PURPOSE:

To establish policies and procedures related to the Deficit Reduction Act, the False Claims Act, Whistleblowers Protections, for detecting and preventing fraud, waste, and abuse.

II. APPLICATION:

The policies and procedures stated herein apply to all GT Independence employees.

III. REFERENCE:

- A. Deficit Reduction Act of 2005, Sections 6031, 6032
- B. Federal False Claim Act
- C. Michigan False Claim Act
- D. Wisconsin False Claim Act
- E. North Carolina False Claim Act
- F. Florida False Claim Act
- G. Additional State False Claim Acts will be added as needed.

IV. DEFINITIONS:

- A. Fraud: The wrongful or criminal deception intended to result in financial or personal gain.
- B. Whistleblower: A person who informs on a person or organization engaged in an illicit activity.

V. POLICY:

GT Independence will minimize the opportunity for fraud, waste, and abuse and report incidents as required by all applicable state and federal laws. All employees, including management, and any contractors or agent are educated regarding the federal and state false claims statutes and the role of such laws in preventing and detecting fraud, waste and abuse in health care programs. They must also be aware of the protections afforded them in reporting fraud, waste, and abuse.

VI. PROCEDURES:

GT Independence, responsibilities include, but are not limited to:

- A. Prior to employment, all employees must satisfactorily pass a Criminal Background Check (See Policy 4-31 Criminal Background Checks), which includes the federally funded healthcare fraud check through the Office of Inspector General's List of Excluded Individuals and Entities.
- B. On at least a monthly basis all current staff, subcontractors, and providers will be checked against the federal List of Excluded Individuals and Entities (LEIE), or its equivalent, and the federal Excluded Parties List System (EPLS), or their equivalent to identify excluded parties.
- C. Ensuring that all employees of GT Independence, including management, are trained at hire and annually regarding the False Claims and Whistleblowers Act, Ethical Standards, Company Mission and Values, and Corporate Compliance. Associated policies and procedures are also electronically accessible at anytime. Additional training materials will be provided at department levels and as needed.
- D. Any contractors or agents of GT Independence are required to sign a Business Associate Agreement and trained as necessary for the work performed.
- E. At least one licensed CPA will be maintained on staff and credentials checked annually.
- F. An independent financial audit will be performed annually by a licensed, CPA firm.
- G. GT Independence employees acknowledge that the actions listed below, and any other action (or inaction) that results in fraud, waste, or abuse of public resources, to the extent that GT Independence becomes aware of or suspects fraud or abuse, creates an obligation to respond in accordance with Federal and State regulations and the expectations defined in its contracts.
- H. The responsibility of the individual employee is to complete an Incident Report, as follows:
 - The Incident Report form is located P:\GFS File Server\Fiduciary Services\Common Forms & Letters- all states\Internal Forms
 - The form should be fully completed with no missing information.
 - Language must be objective. Do not use opinions or make assumptions.

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- The following are potential warning signs of fraud, waste, or abuse that would necessitate completion of an incident report:
 - Timecards that appear to be copied or altered in any way
 - Excessive hours being claimed for a pay period
 - No hours claimed over a 3 month period
 - High employee turnover
 - Indications participants or workers are over-controlling services such as only the participant calling about the employees paycheck/employee never makes contact
 - Purchasing excessive fuel that is not consistent with mileage logs
 - Inconsistent and/or suspicious information from caller such as the caller keeps changing the information provided or cannot verify their identity
 - Severe complaints
 - Episodes of aggressive behaviors
 - Any other behaviors that are not consistent with the intended purpose of the program
 - The process flow for the Incident Report is as follows:
 - 24 hours Complete the incident report, fax and make verbal notification to Case Manager.
 - 5 Calendar Days Submit to Supervisor/Team Leader with follow-up information from Case Manager. If no follow-up information has been received, make and record an additional call to the Case Manager and submit to Supervisor/Team Leader.
 - 10 Calendar Days Supervisor/Team Leader reviews, implements corrective actions needed, and escalates it above Case Manager if there has been no response from agency. A final copy is submitted to the Compliance Officer.
- I. Any reports of fraud, abuse, or neglect will be reported and investigated per the Corporate Compliance Plan, see Policy 1-09.
- J. GT will cooperate with and allow record access to authorized federal and state agencies in the investigation process, as required by state and federal law. Access will be provided during normal business hours, except under special circumstances approved by the CEO.
- K. The Quality Improvement Team actively solicits, reviews, and implements (as appropriate) input on improving waste reduction.
- L. Making revisions to this policy as necessary to comply with changes in law or addition of laws as business in new states is granted. GT Independence responsibilities include, but are not limited to the following:

Reporting Fraud and False Claims under the Deficit Reduction Act of 2005

GT Independence follows rules promulgated under the Deficit Reduction Act. The following information is the basis for staff training and orientation.

The Deficit Reduction Act (DRA) requires that covered healthcare entities must establish policies that provide detailed information about the False Claims Act, Whistleblower protections, and policies and procedures for detecting and preventing fraud, waste, and abuse. This policy provides details about these aspects of our healthcare operations and serves as a template for our employee education efforts. The DRA requires that covered healthcare entities address these areas with all employees including all levels of management, and employees of any contractors by January of 2007. Following is information and a list of resources for all staff.

False Claim Act (FCA)

The False Claims Act (FCA) is a Federal law that establishes criminal and civil liability when any covered person or covered entity improperly receives reimbursement from or avoids payments to the Federal government. The act specifically excludes tax fraud, which is covered by other status. Due to its role in processing payments from the Medicaid program (and State General Funds), individuals and entities that do business with Community Mental Health Boards are covered entities. In particular, the FCA prohibits:

- Knowingly presenting, or causing to be presented, a false claim for payment
- Knowingly making, using or causing to be made or used, a false record or statement to get a false claim paid

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or approved;

- Conspiring to defraud by getting a false claim allowed or paid;
- Certifying receipt of property on a document without completely knowing that the information is true and correct;
- Knowingly buying government property from an unauthorized officer of the government, and;
- Knowingly making, using or causing to be made or used a false record to avoid, or decrease an obligation to pay or transmit property to the government.

The FCA includes a "qui tam" provision, literally "Who sues on behalf of the king as well as for himself." This provision allows a private citizen to file a suit in the name of the U.S. Government charging fraud by government contractors and other entities that receive or use government funds. The filer of the suit may share in any money recovered.

Whistleblower Employee Protections

"Whistleblowers" are those private citizens who file suit on behalf of the government to recover damages incurred by the federal government as a result of the contractor fraud or other false claims. Whistleblowers may be an entity to a significant portion of the proceeds should the suit prevail and are protected from retaliation by provision of the statute. In particular any retaliation against an employee or contractor for lawfully reporting, investigating, or activities in association with an alleged violation of the false claims act, or who is discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against in the terms and conditions of employment by his or her employer because of lawful acts done by the employee on behalf of his employer or others in furtherance of an action under the law, including entitled to all relief necessary to make the employee whole.

Types of Fraud Prosecuted under the FCA

- Billing for goods and services that were never delivered or rendered
- Submitting false service records or samples in order to show better-than-actual performance
- Performing inappropriate or unnecessary medical procedures
- Billing in order to increase revenue instead of billing to reflect actual work performed
- Up-coding —inflating bills by using diagnosis billing codes that suggest a more expensive illness or treatment
- Double billing-charging more than once for the same service or goods
- Prescribing a medicine or recommending a type of treatment or diagnosis regimen in order to win kickbacks from hospitals, labs or pharmaceutical companies
- Billing for unlicensed or unapproved drugs
- Forging physician signatures when such signatures are required for reimbursement from Medicare or Medicaid
- Billing for work or tests that were not performed
- Phantom employees and doctored time slips: charging for employees that were not actually on the job, or billing for made-up hours in order to maximize reimbursements
- Billing Medicare for services that were not performed or were unnecessary

Additional information can be obtained by visiting the following websites:

<http://www.taf.org/federalfca.htm>

<http://www.taf.org/whvfca.htm>

[http://whistleblowerlaws. Com/protection.htm](http://whistleblowerlaws.Com/protection.htm)

<http://www.ledgislature.mi.gov/documents/2005-2006/billengrossed/house/htm/2005-HEBS4577.htm>

VII. REVIEW RESPONSIBILITY:

This information shall be reviewed annually.

PURPOSE: To ensure that computer resources and all data available to them are safeguarded from misuse, viruses, theft, damage and unauthorized disclosure.

APPLICATION: All employees of GT Independence. All users of PHI computer resources must comply with these security policies and standards.

I. REFERENCE:

HIPAA (HITECH) Privacy Regulations

II. DEFINITIONS:

III. POLICY:

GT Independence will provide secure systems to store and exchange all information, including Protected Health Information. This includes all employees contractors, consultants, and other non-employees that access data or use PHI resources. Violators of this policy will be dealt with in accordance with personnel policies, contractual agreements, and or legal statutes as appropriate.

IV. PROCEDURES:

A. GT Independence will provide the following IT Security requirements of HIPAA and HITECH:

1. Unique Passwords and Password Encryption
2. Encryption of attached documents
3. Encryption of emails and documents attached to emails.
4. The removal and or encryption of identifiers thereby making the data no longer PHI
5. User access will be assigned based on necessity and evaluated quarterly and when an employee changes positions or is terminated. This is completed and documented on a log by the Network Administrator.

B. User responsibilities include:

1. Users may not allow other persons to access GT INDEPENDENCE computer systems with their password or account. Users are responsible for activity conducted under their account ID.
2. Users must report, as soon as possible, any security or privacy incidents and violations or suspected violations of this policy to their supervisor.
3. Remote access, user passwords and user IDs are considered sensitive information and will be protected as such. Users will employ the same procedures and caution as is they do with GT INDEPENDENCE confidential information when dealing with these types of information.
4. Adhering to all software copyright laws.
5. Use of unauthorized or unlicensed software is strictly prohibited.
6. Users will not use their accounts or GT INDEPENDENCE computer resources for personal gain, to in anyway harass an individual, or to create or disseminate obscene/pornographic material.
7. Users will not access any unwarranted information.

C. E-mail Usage

The e-mail systems provided by GT INDEPENDENCE are owned by GT INDEPENDENCE and are provided for conducting official business. All data on these systems, including e-mail, are the property of GT INDEPENDENCE. GT INDEPENDENCE employees should not have an expectation that e-mail is private. Contents can be monitored, and review of employee e-mail may occur when a business situation so warrants. In such cases, an employee's e-mail will be reviewed if specifically authorized GT INDEPENDENCE Manager or above, or law enforcement representative duly authorized by the court. Except for on-site consultants, e-mail is generally NOT provided to non-GT INDEPENDENCE employed system users.

In its basic form, e-mail is an inherently insecure method of information exchange. Most mail systems send messages in clear text. Users are required to take "reasonable" efforts to protect the security and

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integrity of patient confidential information. PHI should never be included in an email message. If mail-delivery or faxing the information will not meet the business need then the process to be used should be approved by the CEO.

Occasional personal use of the GT INDEPENDENCE e-mail system is permitted. Users should limit the personal use of GT INDEPENDENCE e-mail just as they do telephone services. Excessive or inappropriate personal use could result in the loss of e-mail privileges and/or an administrative personnel action.

All e-mail originating from GT INDEPENDENCE systems is considered official GT INDEPENDENCE correspondence. All email addressed to users outside of the GT INDEPENDENCE email domain (gtindependence.com) will contain the following notice:

Confidentiality Notice: This message and any attachments may contain information that is confidential, privileged and/or protected from disclosure under state and federal laws that deal with the privacy and security of medical information. If you received this message in error or through inappropriate means, please reply to this message to notify the Sender that the message was received by you in error, and then permanently delete this message from all storage media, without forwarding or retaining a copy.

D. Inappropriate E-mail Activities

Inappropriate activities include but are not limited to:

1. Users may not include inappropriate materials in their messages. Examples of inappropriate materials include, but are not limited to, derogatory or defamatory language, profanity, pornography, or racial or ethnic slurs.
2. Use of e-mail to harass others is illegal.
3. Use of GT INDEPENDENCE e-mail for personal profit is not permitted.
4. Distribution of electronic chain mail is prohibited. Chain mail puts undue stress on GT INDEPENDENCE systems and may often include detrimental or inappropriate content such as (but not limited to): Contagious e-mail viruses. Hoaxes about missing children, viruses, urban legends, money, etc... Political, sexual, religious content, which may be offensive to co-workers.
Note: Chain mail usually includes verbiage such as "forward this to everyone you know" or "forward this to 9 people in the next 5 minutes and you will have good luck all day". Please delete any chain mail you receive or contact IS Security at 269-651-4500 for guidance.
5. Game playing, distributing games, or gambling.
6. Conducting any activity that interferes with or detracts from the user's or other's work duties.
7. Conducting any activity that may reflect poorly on the user or GT INDEPENDENCE.
8. Advocating personal religious or political views and opinions.
9. Forging or attempting to forge e-mail.

E. Instant Messaging

Instant Messaging services are not allowed at GT INDEPENDENCE except in special cases. Requests for IM services must be in writing and approved by the CEO.

F. Remote Access

Remote access capability is provided to GT INDEPENDENCE computer users on an as-needed basis. The system user must have their manager/supervisor's approval to request remote access. The only remote access allowed is through the secured GT INDEPENDENCE servers provided for this purpose. Identification and authentication of users connecting to GT INDEPENDENCE is through the user's GT INDEPENDENCE user ID and password.

1. Remote Access Locations – Remote access users may only connect from approved locations. Currently approved remote locations are limited to a users personal residence. All other locations require prior authorization.
2. User's responsibilities – While working off-site, users must remember that GT INDEPENDENCE confidential information must be given the same attention to security as when working on it at GT INDEPENDENCE location. Confidential and sensitive information should not be stored on your home computer's hard-drive (unless it is encrypted) even if it is a GT INDEPENDENCE provided computer. Nor should any laptop computer or computer media (CD-ROMS, diskettes, tapes, etc.) containing

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- confidential or sensitive information be left unsecured when working off-site. In general such information will not be stored at personnel residence beyond the period of time that it is being used.
3. Off-site protection of data – Storage media containing patient data or other sensitive information should be labeled as such, and at a minimum stored in a locked desk drawer or cabinet. The key or combination must be strictly controlled from unauthorized access. Any printed materials (hard copies) containing confidential or sensitive information will, at a minimum, also be stored as above.
 4. While traveling it is imperative that GT INDEPENDENCE employees protect any equipment and media in their possession. For example, when staying at a hotel while carrying a laptop, the laptop may not be left in the hotel unless locked in a safe in the room or in the hotel's main safe. Always obtain a receipt when leaving a laptop with hotel personnel for security purposes. Note: You must get prior approval from GT INDEPENDENCE before utilizing a remote connection to GT INDEPENDENCE from any unapproved location.
 5. All GT INDEPENDENCE information processed off-site is the property of GT INDEPENDENCE and must be returned immediately upon request of GT INDEPENDENCE
 6. GT INDEPENDENCE employees will ensure that adequate measures are in place to protect equipment and information from theft, abuse, unauthorized use, and unauthorized disclosure.

G. Current System Information

Technical Controls:

Communication of PHI be handled securely with 256 bit encryption and FTP (both at -rest and in-transit). Encryption is required at all times with any connection to our network from outside with complex password protection on all data.

Anti-malware: TrendMicro server edition and client nodes.

Wireless security controls: WPA2 encryption

Secure portable devices and media by requiring complex password required for entry.

Data is removed from a device or medium to prepare it for reuse by reformatting the drive.

We handle disposal of confidential data on all media by disk-wipe.

To avoid breaches in electronic information our internet service provider issued our organization a static IP address which all of our internet traffic will always originate from.

All physical and electronic information is segregated by Contract including all reports and billings.

All employees receive HIPAA training at the time they are hired. Follow up training is held annually which is more related to their specific functions

The definition of Incidents, how they are reported, notification and sanctions are defined in our HIPPA Privacy Reporting of Data Breach Policy.

Review Responsibility: This information shall be reviewed annually.

I. PURPOSE:

This policy establishes the standards of GT Independence for the retention and disposal of non-clinical records.

II. APPLICATION:

The policies and procedures stated herein apply to all GT Independence employees.

III. REFERENCE:

- A. Michigan Department of History, Arts and Libraries, State of Michigan Records Management General Schedule #20 - Community Mental Health Services Programs, approved 5/1/07
- B. Michigan Department of History, Arts and Libraries, State of Michigan Records Management General Schedule #1 - Non-Records, approved 11/16/04
- C. Michigan Department of History, Arts and Libraries, State of Michigan Records Management General Schedule #5 - Administrative Records, approved 10/19/10
- D. Michigan Department of History, Arts and Libraries, State of Michigan Records Management General Schedule #6 - Accounting and Purchasing Records, approved 3/20/01
- E. Michigan Department of History, Arts and Libraries, State of Michigan Records Management General Schedule #7 - Human Resources Records, approved 12/2/03

IV. DEFINITIONS:**Public Record**

A record created or possessed by an agency pursuant to law or under color of law in connection with an activity relating to or affecting the transaction of the agency's business, and that is created or maintained by the agency as evidence of the agency's organization, function, policy, decisions, operation, or activity, or because of the record's informational value.

Examples include, but are not limited to, letters, memos, reports, maps, photographs, microfilm, e-mail messages, word processed documents, contracts, receipts, vouchers, and databases, etc. This definition does not include records that are loaned to an agency.

Non-Public Recorded Information

Recorded information which are common and to which retention and disposal schedules do not apply. They have no administrative, legal, archival, or fiscal value. Examples include, but are not limited to:

1. Telephone messages and carbon copies of phone messages; extra or identical duplicate copies of documents if the official records have been retained by the agency;
2. Preliminary drafts of letters, memoranda, reports, worksheets, and internal notes (including those that are word processed) that do not represent significant basic steps in the preparation of public documents; Sign-in sheets;
3. Shorthand notes and recordings that have been transcribed into another format for official retention purposes;

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4. "For your information" courtesy copies, letters of transmittal (including routing slips) which do not add any information to the transmitted material, and other types of routine correspondence (may include e-mail) that do not document significant activities of the agency; Miscellaneous notices or memoranda which do not relate to the legal and functional responsibilities of the agency, such as notices about community events, holidays, etc.
 5. Media used for printing or other records reproduction; and processes, publications, forms, and printed documents that are superseded or outdated; and
 6. Catalogs or other publications received from outside sources that are not essential to the operation of the agency.

V. STANDARDS:

A. General

GT INDEPENDENCE public records may be disposed of only in accordance with this policy. GT INDEPENDENCE non-records may be disposed of as soon as they have served their intended purpose.

B. Administrative Records

1. **Transitory Correspondence**
Transitory Correspondence is written communication of short term interest which has no documentary value and need not be retained more than 30 days. This type of correspondence message has limited administrative and evidential value which is lost soon after the communication is received. Transitory messages do not set policy, establish guidelines or procedures, certify a transaction or become a receipt. Examples of transitory correspondence include letters of transmittal that do not add information to the transmitted materials, routine requests for information which require no administrative action, policy decision, special compilation or research. This type of record also includes invitations to work-related events, notifications of an upcoming meeting, and similar records.
2. **General Correspondence**
General correspondence may exist in a variety of formats including memos, letters, notes and electronic mail messages. If the correspondence pertains to a specific project or case, it should be filed within that project or case file. General correspondence is often organized chronologically or by correspondent's name.

These records shall be retained at least 2 years beyond their creation.
3. **Correspondence Pertaining to Finance Policy Manuals**
These records shall be retained for 5 years after the applicable policies have been superseded.
4. **Correspondence Pertaining to Inspection Approval Regarding Fire and Safety.** These records shall be retained at least 5 years beyond their creation.

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5. **Administrative Subject File**
These records are used to support administrative analysis, program and project planning, procedure development and programmatic activities for GT INDEPENDENCE. Subject files are generally organized alphabetically by topic. Document types may include periodic progress reports (narrative and statistical), special reports, topical correspondence, research materials, project planning notes, organizational charts, agency descriptions, etc. Subject files do NOT include case files, files related to individual program activities, human resources files, and accounting records.
- Subject files should be retained in the office while the topic is still considered to be of ongoing interest. For topics that will always be active, GT INDEPENDENCE may want to consider cutting off the file every year and creating a new file for subsequent years.
- Topics in the subject files from these offices may be destroyed 6 years after they become inactive.
6. **Policies, Procedures and Directives**
These records include executive directives, regulations, orders, circulars, official memorandum, etc. They do not include distribution and reference copies, or the documentation that is used to develop the policy, procedure or directive.
- These records shall be retained until they are superseded.
7. **Policy Development Records**
These records may include memos, copies of legal decisions, statutes, bulletins, newspaper clippings, drafts, revisions, copies of policies and procedures, and other supporting documentation used in the development and promulgation of official policies and procedures.
- These records shall be retained at least 2 years from the effective date of the (new) policy/procedure or the last date of revision.
8. **Policy-Related Correspondence**
These records shall be retained as long as the applicable policy is in effect and for at least 5 years after the policy has been superseded or removed from its manual.
9. **Meeting Records**
These records may include agendas, supporting documentation, original signed minutes, and tape and video recordings. If tape and video recordings are transcribed the original recordings can be destroyed. These records do not include meeting notices and bulletins and documentation of expenditures. This series includes meeting minutes for the GT INDEPENDENCE Board, administrative committees and sub-committees, etc.
- These records shall be retained at least 6 years beyond their creation.
10. **Staff Meeting Minutes**
These records shall be retained at least 2 years beyond their creation.

11. **Staff Activity Reports**
These reports are prepared by staff members and document work activities.

These records shall be retained at least 5 years beyond their creation.
12. **Statistical Reports**
These reports are prepared monthly, quarterly, and annually and provide information relating to services provided, etc.

These records shall be retained at least 10 years beyond their creation.
13. **Freedom of Information Act (FOIA) Records**
These records will document requests for information and public records maintained by GT INDEPENDENCE. They may include requests for information, correspondence, a copy of the information released, and billing documentation.

These records shall be retained at least 5 years beyond their creation.
14. **Program Plans and Allotments**
These records list the objectives of each program and detail the budget and staff hours which will be utilized for each program. These plans are followed by the report on the actual expenditures.

These records shall be retained at least 5 years beyond their creation.
15. **Litigation Files**
These records may include depositions, transcripts, decisions, correspondence, data, exhibits, research materials, reports, press releases, media clippings, etc.

These records shall be retained at least 10 years after the case is closed.
16. **Publications**
These records include GT INDEPENDENCE-developed publications used as a mechanism to distribute information or publicize GT INDEPENDENCE activities. They include brochures, pamphlets, training materials, fact sheets, books, magazines, newsletters, calendars, CD-Roms, maps, posters, public relations materials, etc.

These records shall be retained at least 1 year beyond their creation.
17. **Publications-Development Records**
These records include drafts, development materials, correspondence, printing request, mock-ups, etc.

These documents shall be retained in the office while the topic is still considered of reference value after the publication is finalized.
18. **Press Releases**
These records may contain documentation pertaining to the development of press releases. Files may include, but are not limited to, work requests,

drafts, approved distribution lists, and official press releases.

These records shall be retained at least 5 years beyond their creation.

19. Photographs

Photographs and negatives may be created to document training, GT INDEPENDENCE accomplishments, initiatives, personnel, and other activities of general interest, and activities of its consumers. Photographs should be labeled, in pencil, to identify people, places, and dates.

These records shall be retained until determined to no longer be essential to achieve the purpose for which they were originally created.

20. Newsletters (Internal)

This record will document official GT INDEPENDENCE newsletters that are published for internal distribution to GT INDEPENDENCE staff.

These records shall be retained at least 10 years beyond their creation.

21. Year 2000 Records

These records may include financial documents, contracts, test plans, test strategies, program status documents, quality assurance forms, implementation plans, reports of datasets and files, "before" database descriptions, "after" database descriptions, etc., which were created to document Y2K compliance of automated systems and services.

These records may be destroyed 7 years after they become inactive.

22. Recipient Rights Files

These records may include recipient rights complaint forms, investigation notes, treatment plans, progress notes, correspondence, incident reports, and other supporting documentation.

These records may be destroyed 10 years beyond their creation.

23. Quality Improvement Documents

These records may include peer reviews, not subject to discovery under the Freedom of Information Act (FOIA), conducted to determine if there has been any variance from established policies and procedures in order to make improvements in the delivery of care and service. These records may include but are not limited to Reports of Consumer Death, Mortality Reviews, Root Cause Analyses, Quality Audits, Performance Improvement Projects, special quality improvement studies, and meeting minutes of quality review activities and supporting documentation.

These documents may be destroyed 7 years beyond their creation.

C. Accounting and Purchasing Records

1. Budget Documentation

These files are maintained for budget planning and allocation purposes and may

include copies of the following: management plans; work sheets; program revisions; expenditure details; related correspondence, etc.

These records shall be retained at least 10 years beyond their creation, or until after the financial audit for the year the expense is related, whichever is longer.

2. Monthly Budget Reports

These are prepared monthly and forwarded to the Michigan Department of Community Health (MDCH).

These records shall be retained at least 10 years beyond their creation, or until after the financial audit for the year the expense is related, whichever is longer.

3. Audit Reports

These records shall be retained at least 7 years beyond their creation, or until after the financial audit for the year the expense is related, whichever is longer.

4. Payment Records

These records document payment transactions. Payments may be related to travel, inter-departmental billings, contracts, vendors, manual warrants, procurement cards, etc. The records may include original hard copy and electronic invoices, billings, packing slips, receivers, approvals, procurement logs, statement reconciliation's, receipts, etc. (Screen prints may be a part of these records, but are not required as part of the official documentation).

These records shall be retained at least 7 years after the fiscal year to which they pertain, or until after the financial audit for the year the expense is related, whichever is longer.

5. Journal Vouchers

These records contain journal vouchers and batch cover sheets and will document corrections, miscellaneous adjustments, reclassifications from undistributed receipts, expenditure and revenue adjustments, year-end adjusting entries, payroll corrections, and various other transactions.

These records shall be retained at least 7 years after the fiscal year to which they pertain, or until after the financial audit for the year the expense is related, whichever is longer.

6. Contracts (Original)

These records contain original contracts documenting agreements between GT INDEPENDENCE and vendors, and between GT INDEPENDENCE and MDCH.

These records shall be retained until contract expiration plus 7 years.

7. Deposit Transactions

These records may include cash receipts, deposit slips, journal vouchers for deposits, bank statements, telephone bills with personal calls attributed to staff, and other supporting documentation.

These records shall be retained at least 10 years after the fiscal year to which they pertain, or until after the financial audit for the year the expense is related, whichever is longer.

8. Year-end Closing Records

These records are used to support the year-end closing function. The records may include correspondence, documentation describing closeout problems and resolution, accounts receivable documents, accounts payable documents, encumbrances, fixed assets, interim assessment/closeout checklist, etc. (Electronic reports may be a part of this record, but are not required as part of the official documentation).

These records shall be retained at least 10 years after the fiscal year to which they pertain, or until after the financial audit for the year the expense is related, whichever is longer.

9. Accounting Records

These records may include audited financial statements, annual audit preparation work papers, Summary by Account/Trial Balance, general ledgers, general journal entries, related source documents, additional documentation, etc.

These records shall be retained at least 7 years beyond their creation, or until after the financial audit for the year the expense is related, whichever is longer.

10. Accounts Receivable Records

These records document money received from revenue sources. The records may contain encumbrance transactions, copies of documents that were posted, payments, etc.

These records shall be retained at least 7 years after the fiscal year to which they pertain, or until after the financial audit for the year the expense is related, whichever is longer.

11. Audited Financial Statements - Historical Copy

These statements are prepared at required intervals and provide financial information relating to GT INDEPENDENCE Board financial activity.

These records shall be retained indefinitely.

12. Cash Management Files

These files may include written policies, daily cash receipts logs, pre-numbered cash receipts, bank reconciliations, cash receipts, journals, etc.

These records shall be retained at least 7 years beyond their creation, or until after the financial audit for the year the expense is related, whichever is longer.

13. Cash Disbursement Records

These include Imprest Cash and Disbursement Vouchers, Travel Expense Vouchers, Purchase Requisitions and Orders, Cash Disbursement Journals, purchasing policies documenting the bid process, related source documents, additional documentation, etc.

These records shall be retained at least 7 years beyond their creation, or until after the financial audit for the year the expense is related, whichever is longer.

-
14. **Grant Files**
These records pertain to grants received and/or administered by the GT INDEPENDENCE Board, including the grant award, financial reports, final reports, related work papers, etc.
- These records shall be retained until grant expiration plus 7 years.
15. **Consumer Fees**
These records include policies, procedures, approved fee schedules, pro-ration reports, third party billings, private pay billings, Medicaid vouchers, remittance advices, peg board sheets, related revenue supporting documentation, etc.
- These records shall be retained at least 7 years beyond their creation, or until after the financial audit for the year the expense is related, whichever is longer.
16. **Consumer Ledger Cards**
- These records shall be retained until 7 years after the consumer ledger cards have expired.
17. **Inventory and Equipment Records**
These include the annual inventory of fixed assets, the inventory ledger, etc.
- These records shall be retained until they are updated plus 7 years.
18. **Approvals for Payment**
These records contain approvals to pay prior year payments over \$1000, in the current year, because they were not set up as an accounts payable in the prior year.
- These records shall be retained at least 10 years after the fiscal year to which they pertain, or until after the financial audit for the year the expense is related, whichever is longer.
19. **Stopped, Cancelled, Undeliverable, and/or Reissued Warrants**
These records may contain signed affidavits and may also include other applicable backup documentation deemed necessary by GT INDEPENDENCE. The records may also include any reissued payroll warrants.
- These records shall be retained at least 7 years after the fiscal year to which they pertain.
20. **Transaction Error Reports**
These records contain supporting documentation to the batch error correction process. The supporting documentation may include screen-prints of errors and selected electronic reports.
- These records shall be retained at least 7 years after the fiscal year to which they pertain.
21. **Procurement Card Application Records**
These records include procurement cardholder applications, cardholder agreement forms, and cardholder maintenance forms.

The record will be retained for as long as the procurement card is held by the cardholder plus 10 years.

22. Procurement Card Billing Statements

These records contain billing statements and supporting documentation detailing purchases made with procurement cards.

These records shall be retained at least 10 years after the fiscal year to which they pertain.

23. Procurement Logs

These logs contain descriptions of each purchase, vendors names, total transaction amounts, dates received, etc., and document the status of purchases made with procurement cards.

These records shall be retained at least 7 years after the fiscal year to which they pertain.

24. Purchase Orders

These records include purchase requisitions and purchase orders.

These records shall be retained at least 7 years after the fiscal year to which they pertain.

25. Billing Summary

These records contain copies of billing statements that provide a summary of department purchases.

These records shall be retained at least 10 years after the fiscal year to which they pertain.

26. Job Tickets

These records are electronically generated and are used to order supplies. The records may also include Advice of Changes.

These records shall be retained at least 7 years after the fiscal year to which they pertain.

D. Human Resource Records

1. Selection Files

These records contain all documents that support appointment and selection activity for employment. They may contain employment lists, transfer lists, selection criteria, evaluation of candidates, position descriptions, applications, interview questions, reference checks, rating forms, and appointment recommendations / notifications.

These records may be destroyed 7 years after they become inactive.

2. Position Files

These files are created for established positions and may include the following:

Position Action Request; Position Description; Application for Classification Redetermination; related correspondence; compensation information, etc. These files document the establishment, reclassifications, restriction, and modification of all GT INDEPENDENCE positions.

These records may be destroyed 5 years after they become inactive.

3. Time, Attendance, Payroll, and Staff Billing Records

These records contain all supporting documentation of payroll activity within GT INDEPENDENCE and are maintained by pay period. Documents include time and attendance reports, leave usage approvals, time cards or sheets signed by employees or individual contractors, attendance records, payroll registers and payroll deduction registers, etc., doctors' schedules and appointment books, staff activity log (SAL) codes, and events lists. NOTE: These records may be found at individual worksites.

These records shall be retained for 10 years after they become inactive.

4. Request for Personnel Services Files

These files contain Requests for Personnel Services for use in hiring contractual services provided by outside vendors. A request includes information such as the date the request was created and/or updated, the vendor and vendor ID, the amount requested for each independent contractor and special personnel services, the effective and ending dates of the services requested, employees who may be affected by the hiring of a contractor, funding source, justification for requesting services, and other pertinent information as well as approval paths.

These records shall be retained at least 5 years beyond their creation.

5. Medical Records (Non-exposures) and may contain the following documentation: medical leave applications; insurance forms (including long term disability forms); leave extension requests; medical certifications by physician; application for continuation of insurances; doctors' releases; supporting medical documentation; blood tests; vision and hearing tests, etc. [See V.D.5. for Medical Records where exposure to hazardous materials has occurred.]

These records may be destroyed 7 years after they become inactive.

6. Grievance Files

These files are maintained to document grievances filed against GT INDEPENDENCE. These records may include: pre-hearing reports; grievance forms; related correspondence; summary sheets; employee history information; decisions, etc.

These records may be destroyed 7 years after the grievance is closed.

7. Medical Records (Exposure)

These records are maintained separate from the employee personnel files and may contain the following documentation: medical leave applications; insurance forms (including long term disability forms); leave extension requests; medical certifications

by physician; application for continuation of insurances; doctors' releases; supporting medical documentation; exposure documentation; blood tests; vision and hearing tests, etc. [See V.D.5. for Medical Records where no exposure to hazardous materials has occurred.]

These records may be destroyed 30 years after they become inactive.

E. Disposal of Non-Clinical Records

1. Paper Non-Clinical Records

The non-clinical records in paper format which are due for disposal shall be disposed of by shredding.

2. Electronic Non-Clinical Records

The electronic non-clinical records which are is due for disposal, shall be destroyed by shredding, or other comparable means.

F. Legal Processes

In the event that a lawsuit is initiated against GT INDEPENDENCE or an employee thereof, any pertinent clinical records which are due for disposal shall not be destroyed but shall be held until conclusion of all litigation pertaining to those records.

VI. Review Responsibility: This information shall be reviewed annually.

-
- I. **PURPOSE:** To establish policies and procedures to ensure effective tracking of communications/complaints.
- II. **APPLICATION:** All programs operated directly or under contract with managed care organizations or other State Agencies
- III. **REFERENCE:** Service Contracts between GT and state Medicaid programs; service contracts between GT and managed care organizations
- IV. **DEFINITIONS:**
Communication Log Software: The electronic database employed by GT Independence to track all incoming customer service communications. Each communication received by customer service staff is documented electronically and maintained in our servers for ten years.
Escalated Communication: Any communication where the caller asks to speak with someone above the front line staff level.
- V. **POLICY:**
- A. The company will at all times endeavor to provide the highest possible level of customer service.
- B. Matters necessitating escalation will be escalated according to the procedure in policy 1-11, Consumer Grievances.
- C. All incoming customer service communications will be documented in the company communication log software.
- D. All communications received will be responded to within the designated guidelines.
1. Calls and voicemails in no more than 24 business hours.
 2. E-mails, faxes, and letters will be responded to within 24 hours whenever possible but no later than 2 business days.
- E. Call data will be tracked daily and reviewed on a regular basis by the customer service department.
- F. Open communications will be reviewed regularly and escalated appropriately.
- G. Issues/complaints will be tracked and analyzed for quality improvement.
- VI. **PROCEDURE:**
- A. Customer Service Associates maintain a register containing the following data elements:
1. Date and time of the communication
 2. Name and title of persons/entities placing and receiving communication
 3. Subject of issue/complaint raised
 4. Narrative of issue/complaint
 5. Status of issue/complaint.
 6. Corrective action taken/resolution and date.
 7. Escalation status
 8. Date the participant's support coordinator was notified, if required.
- B. Call data will be tracked by the following and monitored by the Customer Service Manager.
1. Total Incoming
 2. Answered
 3. Abandoned
 4. Voicemail
 5. Open Issues
- C. Call logs are reviewed by Customer Service Team Leaders and Manager weekly to identify issues and procedure inefficiencies, including open communications.
- D. Issues and procedure inefficiencies will be reviewed and discussed at the Weekly Team Leader meeting and/or Department Head meeting, as appropriate.
- E. Quarterly, the Quality Improvement Department will mail all escalated callers an opportunity to provide feedback regarding their customer service experience and make recommendations annually to the Quality Improvement Team and Executive Committee based on the results. This will begin in 2014.

- F. An annual analysis of escalated communications is done by Customer Service and Quality Improvement. The results and performance improvements are presented to the Quality Management Team. The first set of results will be analyzed for 2014 and a plan developed for 2015.
 - G. Customer Service staff provide a daily report that includes an account of emails, documents received from the post office and faxes which require processing.
- VII. REVIEW RESPONSIBILITY:
This policy and associated procedures shall be reviewed annually.

GT Independence Disaster Recovery Plan

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Introduction

This Disaster Recovery Plan (DRP) captures, in a single repository, all of the information that describes GT Independence's ability to withstand a disaster as well as the processes that must be followed to achieve disaster recovery.

Purpose

Note that in the event of a disaster the first priority of GT Independence is to prevent the loss of life. Before any secondary measures are undertaken, GT Independence will ensure that all employees, and any other individuals on the organization's premises, are safe and secure.

After all individuals have been brought to safety, the next goal of GT Independence will be to enact the steps outlined in this DRP to bring all of the organization's groups and departments back to business-as-usual as quickly as possible. This includes:

- *Preventing the loss of the organization's resources such as hardware, data and physical IT assets*
- *Minimizing downtime related to IT*
- *Keeping the business running in the event of a disaster*

This DRP document will also detail how this document is to be maintained and tested.

Scope

The GT Independence DRP takes all of the following areas into consideration:

- *Network Infrastructure*
- *Servers Infrastructure*
- *Telephony System*
- *Data Storage and Backup Systems*
- *Data Output Devices*
- *End-user Computers*
- *Organizational Software Systems*
- *Database Systems*
- *IT Documentation*

Disaster Recovery Teams & Responsibilities

In the event of a disaster, different groups will be required to assist the IT department in their effort to restore normal functionality to the employees of GT Independence. The different groups and their responsibilities are as follows:

- *Disaster Recovery Lead(s)*
- *Security Team*
- *Facilities Team*
- *Network Team*
- *Server Team*
- *Applications Team*
- *Operations Team*
- *Management Team*

The lists of roles and responsibilities in this section have been created by GT Independence and reflect the likely tasks that team members will have to perform. Disaster Recovery Team members will be responsible for

performing all of the tasks below. In some disaster situations, Disaster Recovery Team members will be called upon to perform tasks not described in this section.

Disaster Recovery Lead

The Disaster Recovery Lead is responsible for making all decisions related to the Disaster Recovery efforts. This person's primary role will be to guide the disaster recovery process and all other individuals involved in the disaster recovery process will report to this person in the event that a disaster occurs at GT Independence, regardless of their department and existing managers. All efforts will be made to ensure that this person be separate from the rest of the disaster management teams to keep his/her decisions unbiased; the Disaster Recovery Lead will not be a member of other Disaster Recovery groups in GT Independence.

Role and Responsibilities

- *Make the determination that a disaster has occurred and trigger the DRP and related processes.*
- *Initiate the DR Call Tree.*
- *Be the single point of contact for and oversee all of the DR Teams.*
- *Organize and chair regular meetings of the DR Team leads throughout the disaster.*
- *Present to the Management Team on the state of the disaster and the decisions that need to be made.*
- *Organize, supervise and manage all DRP test and author all DRP updates.*

Contact Information

Name	Role/Title	Work Phone Number	Home Phone Number	Mobile Phone Number
<i>Patrick Hoelscher</i>	<i>Primary Disaster Lead</i>	<i>269-503-7566</i>	<i>269-221-6294</i>	<i>269-903-8678</i>
<i>Ashlee Gardner</i>	<i>Secondary Disaster Lead</i>		<i>574-370-2234</i>	<i>269-503-2045</i>

Facilities Team

The Facilities Team will be responsible for all issues related to the physical facilities that house IT systems. They are the team that will be responsible for ensuring that the standby facilities are maintained appropriately and for assessing the damage too and overseeing the repairs to the primary location in the event of the primary location's destruction or damage.

Role & Responsibilities

- *Ensure that the standby facility is maintained in working order*
- *Assess, or participate in the assessment of, any physical damage to the primary facility*
- *Ensure that measures are taken to prevent further damage to the primary facility*
- *Work with insurance company in the event of damage, destruction or losses to any assets owned by GT Independence*
- *Ensure that appropriate resources are provisioned to rebuild or repair the main facilities in the event that they are destroyed or damaged*
- *After GT Independence is back to business as usual, this team will be required to summarize any and all costs and will provide a report to the Disaster Recovery Lead summarizing their activities during the disaster*

Contact Information

Name	Role/Title	Work Phone Number	Home Phone Number	Mobile Phone Number
<i>Matt Barnell</i>	<i>Facilities Supervisor</i>			
<i>Mike Miller</i>	<i>CFO</i>			

Network Team

The Network Team will be responsible for assessing damage specific to any network infrastructure and for provisioning data and voice network connectivity including WAN, LAN, and any telephony connections internally within the enterprise as well as telephony and data connections with the outside world. They will be primarily responsible for providing baseline network functionality and may assist other IT DR Teams as required.

Role & Responsibilities

- *In the event of a disaster that does not require migration to standby facilities, the team will determine which network services are not functioning at the primary facility*
- *If multiple network services are impacted, the team will prioritize the recovery of services in the manner and order that has the least business impact.*
- *If network services are provided by third parties, the team will communicate and co-ordinate with these third parties to ensure recovery of connectivity.*
- *In the event of a disaster that does require migration to standby facilities the team will ensure that all network services are brought online at the secondary facility*
- *Once critical systems have been provided with connectivity, employees will be provided with connectivity in the following order:*
 - *All members of the DR Teams*
 - *All C-level and Executive Staff*
 - *All IT employees*
 - *All remaining employees*
- *Install and implement any tools, hardware, software and systems required in the standby facility*
- *Install and implement any tools, hardware, software and systems required in the primary facility*
- *After GT Independence is back to business as usual, this team will be summarize any and all costs and will provide a report to the Disaster Recovery Lead summarizing their activities during the disaster*

Contact Information

Name	Role/Title	Work Phone Number	Home Phone Number	Mobile Phone Number
<i>Ashlee Gardner</i>	<i>IT Administrator</i>	<i>269-651-4500</i>	<i>574-370-2234</i>	<i>269-503-2045</i>
<i>Bryan Valdes</i>	<i>IT Systems Technician</i>			<i>810-471-8655</i>
<i>Nick Jojola</i>	<i>IT Systems Engineer</i>			<i>269-503-0670</i>
<i>Patrick Hoelscher</i>	<i>IT Director</i>	<i>269-503-7566</i>	<i>269-221-6294</i>	<i>269-903-8678</i>

Server Team

The Server Team will be responsible for providing the physical server infrastructure required for the enterprise to run its IT operations and applications in the event of and during a disaster. They will be primarily responsible for providing baseline server functionality and may assist other IT DR Teams as required.

Role & Responsibilities

- *In the event of a disaster that does not require migration to standby facilities, the team will determine which servers are not functioning at the primary facility*
- *If multiple servers are impacted, the team will prioritize the recovery of servers in the manner and order that has the least business impact. Recovery will include the following tasks:*
 - *Assess the damage to any servers*
 - *Restart and refresh servers if necessary*
- *Ensure that secondary servers located in standby facilities are kept up-to-date with system patches*
- *Ensure that secondary servers located in standby facilities are kept up-to-date with application patches*
- *Ensure that secondary servers located in standby facilities are kept up-to-date with data copies*
- *Ensure that the secondary servers located in the standby facility are backed up appropriately*
- *Ensure that all of the servers in the standby facility abide by GT Independence's server policy*
- *Install and implement any tools, hardware, and systems required in the standby facility*
- *Install and implement any tools, hardware, and systems required in the primary facility*
- *After GT Independence is back to business as usual, this team will be summarize any and all costs and will provide a report to the Disaster Recovery Lead summarizing their activities during the disaster*

Contact Information

Name	Role/Title	Work Phone Number	Home Phone Number	Mobile Phone Number
<i>Ashlee Gardner</i>	<i>IT Administrator</i>	<i>269-651-4500</i>	<i>574-370-2234</i>	<i>269-503-2045</i>
<i>Nick Jojola</i>	<i>IT Systems Technician</i>			<i>269-503-0670</i>

Applications Team

The Applications Team will be responsible for ensuring that all enterprise applications operates as required to meet business objectives in the event of and during a disaster. They will be primarily responsible for ensuring and validating appropriate application performance and may assist other IT DR Teams as required.

Role & Responsibilities

- *In the event of a disaster that does not require migration to standby facilities, the team will determine which applications are not functioning at the primary facility*
- *If multiple applications are impacted, the team will prioritize the recovery of applications in the manner and order that has the least business impact. Recovery will include the following tasks:*
 - *Assess the impact to application processes*
 - *Restart applications as required*
 - *Patch, recode or rewrite applications as required*
- *Ensure that secondary servers located in standby facilities are kept up-to-date with application patches*
- *Ensure that secondary servers located in standby facilities are kept up-to-date with data copies*
- *Install and implement any tools, software and patches required in the standby facility*
- *Install and implement any tools, software and patches required in the primary facility*
- *After GT Independence is back to business as usual, this team will be summarize any and all costs and will provide a report to the Disaster Recovery Lead summarizing their activities during the disaster*

Contact Information

Name	Role/Title	Work Phone Number	Home Phone Number	Mobile Phone Number
<i>Kyle Thompson</i>	<i>Systems Engineer</i>			
<i>William Yearling</i>	<i>Software Developer</i>			

Senior Management Team

The Senior Management Team will make any business decisions that are out of scope for the Disaster Recovery Lead. Decisions such as constructing a new data center, relocating the primary site etc. should be made by the Senior Management Team. The Disaster Recovery Lead will ultimately report to this team.

Role & Responsibilities

- *Assist the Disaster Recovery Team Lead in his/her role as required*
- *Make decisions that will impact the company. This can include decisions concerning:*
 - *Rebuilding of the primary facilities*
 - *Rebuilding of data centers*
 - *Significant hardware and software investments and upgrades*
 - *Other financial and business decisions*

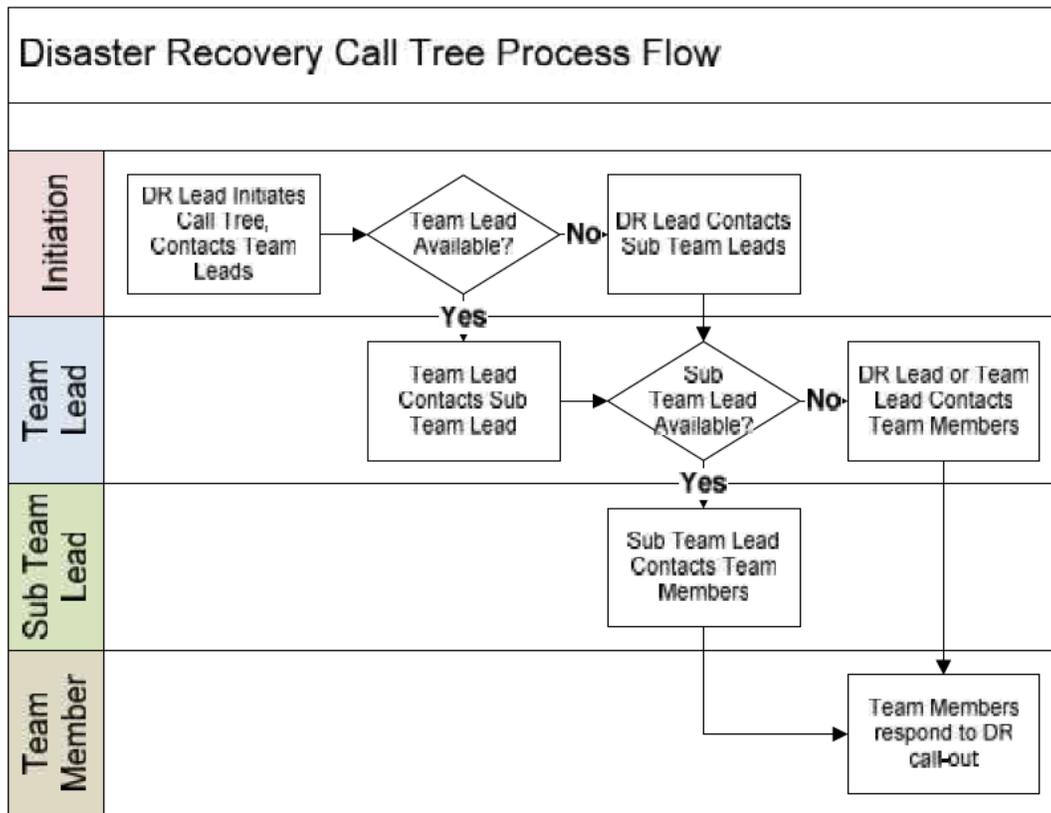
Name	Role/Title
<i>John Carmichael</i>	<i>CEO</i>
<i>Holly Carmichael</i>	<i>COO</i>
<i>Mike Miller</i>	<i>CFO</i>
<i>Chris Taylor</i>	<i>Director, Compliance</i>
<i>Kathryn Meyers</i>	<i>Director, Human Resources</i>
<i>Rob Lewis</i>	<i>Director, Field Operations</i>
<i>Adam Kujacznski</i>	<i>Director, Marketing</i>
<i>Patrick Hoelscher</i>	<i>Director, Information Technology</i>

Disaster Recovery Call Tree

In a disaster recovery or business continuity emergency, time is of the essence so GT Independence will make use of a Call Tree to ensure that appropriate individuals are contacted in a timely manner.

- The Disaster Recovery Team Lead calls all Level 1 Members (Blue cells)
- Level 1 members call all Level 2 team members over whom they are responsible (Green cells)
- Level 1 members call all Level 3 team members over whom they are directly responsible (Beige cells)
- Level 2 Members call all Level 3 team members over whom they are responsible (Beige cells)
- In the event a team member is unavailable, the initial caller assumes responsibility for subsequent calls (i.e. if a Level 2 team member is inaccessible, the Level 1 team member directly contacts Level 3 team members).

Contact	Office	Mobile	Home
DR Lead <i>Patrick Hoelscher</i>	269-503-7566	269-903-8678	269-221-6294
Facilities Team Lead		269-503-2873	
Facilities Team 1			
Network Team Lead		574-370-2234	
LAN Team 1			
Applications Team Lead		269-503-2045	
App Team			
Management Team			



Data and Backups

This section lists all of the organization's data as well as where it is backed up and replicated to. Use this information to locate and restore data in the event of a disaster.

Data in Order of Criticality

Rank	Data	Data Type	Back-up Frequency	Backup Location(s)
1	Participant/Employee Data, Call Log, ERP, Financial, HR	Personally identifying information	Hourly replication during business hours; Backups daily	Off-site >> Hatch building Sturgis, MI
2	File Servers	Personally identifying information	Hourly replication during business hours; Backups daily	Off-site >> Hatch building Sturgis, MI
3	Domain Controllers	Confidential	Replication 3 times per day	Off-site >> Hatch building Sturgis, MI
4	Participant/Employee Documents	Personally identifying information	Hourly replication, backups twice daily	Off-site >> Hatch building Sturgis, MI
5	Internal business documents	Confidential	Hourly replication, Backups daily	Off-site>> Hatch building Sturgis, MI
6	Email	Confidential	Replication every 2 hours; Daily Backups	Off-site>> Hatch building Sturgis, MI
7				
8				
9				
10				

Communicating the Disaster

Communicating with Employees

Communicating with employees is critical in the event of a disaster. Our phone system is a cloud based system that can be accessed from anywhere. The host has multiple failover datacenters. Our on-premise fax and email servers are setup to failover to a duplicate host. We also maintain an emergency contact list.

The employees will need to be informed of the following:

- *Whether it is safe for them to come into the office*
- *Where they should go if they cannot come into the office*
- *Which services are still available to them*
- *Work expectations of them during the disaster*

Communicating with Clients

After GT Independence employees have been informed of the disaster, remote call center capabilities will be enabled. The remote call center will inform clients of the following:

- *Anticipated impact on service offerings*
- *Anticipated impact on security of client information*
- *Anticipated timelines*

Communicating with the Media

After all of the organization's employees have been informed of the disaster, the Communications Team will be responsible for informing media outlets of the disaster, providing the following information:

- *An official statement regarding the disaster*
- *The magnitude of the disaster*
- *The impact of the disaster*
- *Anticipated timelines*

Dealing with a Disaster

If a disaster occurs in GT Independence, the priority is to ensure that all employees are safe and accounted for. After this, steps must be taken to mitigate any further damage to the facility and to reduce the impact of the disaster to the organization.

Regardless of the category that the disaster falls into, dealing with a disaster can be broken down into the following steps:

- 1) Disaster identification and declaration
- 2) DRP activation
- 3) Communicating the disaster
- 4) Assessment of current and prevention of further damage
- 5) Standby facility activation

- 6) Establish IT operations
- 7) Repair and rebuilding of primary facility

Disaster Identification and Declaration

Since it is almost impossible to predict when and how a disaster might occur, GT Independence must be prepared to find out about disasters from a variety of possible avenues. These can include:

- *First hand observation*
- *System Alarms and Network Monitors*
- *Environmental and Security Alarms in the Primary Facility*
- *Security staff*
- *Facilities staff*
- *End users*
- *3rd Party Vendors*
- *Media reports*

Once the Disaster Recovery Lead has determined that a disaster had occurred, s/he must officially declare that the company is in an official state of disaster. It is during this phase that the Disaster Recovery Lead must ensure that anyone that was in the primary facility at the time of the disaster has been accounted for and evacuated to safety according to the company's Evacuation Policy.

While employees are being brought to safety, the Disaster Recovery Lead will instruct the Communications Team to begin contacting the Authorities and all employees not at the impacted facility that a disaster has occurred.

DRP Activation

Once the Disaster Recovery Lead has formally declared that a disaster has occurred s/he will initiate the activation of the DRP by triggering the Disaster Recovery Call Tree. The following information will be provided in the calls that the Disaster Recovery Lead makes and should be passed during subsequent calls:

- *That a disaster has occurred*
- *The nature of the disaster (if known)*
- *The initial estimation of the magnitude of the disaster (if known)*
- *The initial estimation of the impact of the disaster (if known)*
- *The initial estimation of the expected duration of the disaster (if known)*
- *Actions that have been taken to this point*
- *Actions that are to be taken prior to the meeting of Disaster Recovery Team Leads*
- *Scheduled meeting place for the meeting of Disaster Recovery Team Leads*
- *Scheduled meeting time for the meeting of Disaster Recovery Team Leads*
- *Any other pertinent information*

If the Disaster Recovery Lead is unavailable to trigger the Disaster Recovery Call Tree, that responsibility shall fall to the Disaster Management Team Lead

Assessment of Current and Prevention of Further Damage

Before any employees from GT Independence can enter the primary facility after a disaster, appropriate authorities must first ensure that the premises are safe to enter.

The first team that will be allowed to examine the primary facilities once it has been deemed safe to do so will be the Facilities Team. Once the Facilities Team has completed an examination of the building and submitted its report to the Disaster Recovery Lead, the Disaster Management, Networks, Servers, and Operations Teams will be allowed to examine the building. All teams will be required to create an initial report on the damage and provide this to the Disaster Recovery Lead within 48 hours of the initial disaster.

During each team's review of their relevant areas, they must assess any areas where further damage can be prevented and take the necessary means to protect GT Independence's assets. Any necessary repairs or preventative measures must be taken to protect the facilities; these costs must first be approved by the Disaster Recovery Team Lead.

Restoring IT Functionality

Should a disaster actually occur and GT Independence need to exercise this plan, this section will be referred to frequently as it will contain all of the information that describes the manner in which information system will be recovered.

IT Systems

Rank	IT System	System Components (In order of importance)
1	Communications	Customer Service Phone Lines, Customer Service Email, Fax Servers, Authentication
2	Business Systems	SQL Server, ERP, Payroll Management Systems, Application Servers
3	Document Management	M-Files, File Servers
4	Secure FTP	FTP Server
5	Monitoring	WSUS, SolarWinds, Security Management
6	Backups	Replication and Shadow Copies
7	Remote Desktops	Terminal Servers for remote work
8	Reporting	Report Servers
9	Print Services	Print Servers

Plan Testing & Maintenance

This plan will need to be tested on a periodic basis to discover errors and omissions and will need to be maintained to address them. At a minimum, the following critical pieces to DR plan will be tested on a schedule.

Core Function	Frequency
Headquarters Facility Generator	Weekly
Server & Data Replication	Monthly
Backup Archives	Monthly



State of Vermont

Department of Disabilities, Aging and Independent Living in
Conjunction with the Vermont Department of Health, Children with
Special Needs

Proposal to Provide Fiscal/Employer Agent Services

August 28th, 2017 1:00PM

Department of Disabilities, Aging and Independent Living
280 State Drive HC2 South
Waterbury, VT 05671

Letter of Submittal



www.gtindependence.com

August 25th, 2017

Lisa Neveu
Quality Outcomes Specialist
280 State Drive HC 2 South
Waterbury, VT 05671
Lisa.Neveu@vermont.gov
802-241-0385

Dear Ms. Neveu,

Thank you for the opportunity to submit a proposal to provide Fiscal/Employer Agent Services for the State of Vermont. GT Independence is a family owned, nationally recognized provider of Financial Management Services for home and community based care programs around the country.

Organization Information:

GT Independence is the trade name for Guardiantrac, LLC, a Limited Liability Company organized in the State of Michigan. The company is held entirely by members of the Carmichael family. The company's CEO, John Carmichael is the managing member.

Principal Officer: John Carmichael
507 E. South Street, Sturgis, MI 49091
(269)-651-4500

Program Leader: Robert Lewis
1421 E Rishel, Sturgis, MI 49091
(269)-569-2332

Enclosed Materials

GT Independence Proposal to Provide Fiscal/Employer Agent Services to the State of Vermont:

1. Qualifications
2. Work Plan
3. Reporting Requirements
4. Certificate of Compliance
5. Price Quotation / Cost Proposal
6. Electronic Visit Verification (EVV) Summary
7. Attachments
 - a. Attachment A – Personnel Resumes
 - b. Attachment B - Excerpt from Participant Feedback Committee Handbook
 - c. Attachment C – 6-08 Call Response Time



- d. Attachment D – Reference Letters
- e. Attachment E – Table of Programs
- f. Attachment F – Job Descriptions
- g. Attachment G - Draft Attendant Services Program Utilization Management Policy
- h. Attachment H - 6-12 Consumer Enrollment Meetings
- i. Attachment I – 6-24 Processing Tax Filings
- j. Attachment J – 6-25 Garnishments
- k. Attachment K – 6-14 Receipt of Time Reports
- l. Attachment L – Payroll Schedule M
- m. Attachment M – 6-23 Check Distribution Policy
- n. Attachment N – 6-18 Consumer Termination
- o. Attachment O - Wage Change Form
- p. Attachment P - 6-32 Preparing Year End Tax Documentation
- q. Attachment Q - 6-42 Workers' Compensation Policies and Claims
- r. Attachment R - 6-39 Hiring and Paying Independent Contractors
- s. Attachment S - 6-27 FICA Refunds – Vermont
- t. Attachment T - 4-21 Mandatory Training
- u. Attachment U - 2-11 Communication Accommodations
- v. Attachment V – 1-03 Ethical Standards
- w. Attachment W - 1-10 Cultural Competence and Limited English Proficiency
- x. Attachment X – Audited Financial Statements
- y. Attachment Y – Key Bank Reference
- z. Attachment Z - 6-20 Monthly Consumer Reports
- aa. Attachment AA - 3-21 Incident Reporting
- bb. Attachment BB - 1-13 Fraud Prevention Program
- cc. Attachment CC - 2-01 Privacy and Security Controls
- dd. Attachment DD – 2-10 Document Retention and Disposal
- ee. Attachment EE - 6-22 Tracking Communication and Complaints
- ff. Attachment FF - IT Disaster Recovery Plan

GT Independence has over thirteen years of experience providing Financial Management Services to participant directed programs and currently serves over 13,000 participants in several states. We look forward to the opportunity to serve Participants in the State of Vermont.

Respectfully,



John H Carmichael, Chief Executive Officer
GT Independence



Qualifications



www.gtindependence.com

Qualifications and Relevant Experience of Vendor and Staff

- a. **Qualifications and experience of the vendor and assigned staff are relevant, adequate, and competitive for the management of a FE/A. Specific elements include:**
- i. *Experience in the management of similar organization.*
GT Independence has the ability to deliver the services outlined in the RFP. The company's philosophy, experience and technical capacity will allow GT to deliver outstanding services that help Vermont program stakeholders realize their desired self-direction outcomes.

Company History

GT Independence came to be through the Carmichael family's efforts to advocate for their family member Ben Carmichael. Ben was born with a condition that would result in a lifelong developmental disability. Through his 42 years, Ben has experienced first-hand the transformation of the public health care system for disabled people. The company, like the family, has values firmly rooted in the idea of Self-Determination for all. GT Independence strives for integrity, professionalism, community, respect and excellence in its approach to financial management and supports broker services.

Bonnie Carmichael, Principal and Founder of GT Independence embodies the company's core principles. As a young accountant at Peat Marwick in Detroit, Bonnie challenged the norms of a male dominated professional culture and succeeded as one of the only female accountants at the company. The arrival of her son, Ben would set her on a new path to change our culture. Before the term Self-Determination was used to describe services for people like Ben, Bonnie was fighting so Ben could have a life that was worth living. She was determined that Ben would not be simply warehoused and left to languish in the institution. She challenged the system and helped Ben get the life he wanted. Then she used her experience and her business skills to help thousands of others like Ben to have a life worth living as well. As the company continues to expand and deliver on its mission to help people live a life of their choosing regardless of age or ability, Bonnie remains the driving force behind GT's culture.

Prior Experience

GT Independence provides Vendor Fiscal/Employer Agent, Agency with Choice and Supports Brokerage Services. The company began operations in Michigan where it contracted with small, county level Community Mental Health Services Programs (CMHSP's) to deliver F/EA services. GT's hands on approach changed the way self-direction was viewed in Michigan. By incorporating supports brokers to conduct face-to-face enrollment, orientation and training

functions, GT removed the significant barriers to participation in Michigan's self-direction program.

The company expanded its services to the frail elderly in Michigan through the MI Choice Waiver program in Michigan in 2006. From 2006 forward, GT expanded to new states with different delivery models. The company maintains a focus on hands on service and stakeholder satisfaction. Today the company serves participants in 9 States and operates within State fee-for-service models, PIHP and MLTSS programs. The company works with several large health plans including Humana, Aetna and Molina.

Since 2004 when the company was founded, GT has helped 20,000 Medicaid beneficiaries direct their own home and community based care. All of those participants received enrollment services and an in-home orientation meeting from a GT Independence supports broker. Last month the company conducted 459 in home orientations. Our average customer satisfaction rate is 98%.

Building a Culture of Self-Determination through Training

Over the past five years the company has grown at an average rate of 30.4%. The company's managers have consistently invested in our most important asset – our people. GT has made numerous investments in training and developing our staff including:

- Targeted Selection training for managers and leads so we can find team members who will share our passion for self-determination
- Comprehensive orientation and skills training for new team members
- Dedicated training coordinator and brand new training facilities
- Leadership development program and leadership training courses taught by GT executive team members
- Continuous technical training through GT's Compliance and Quality Assurance Department
- Professional development and continuing education

The company's workforce investment has become a real strength. Investments have yielded reduced turnover, longer employee tenure and higher job satisfaction which means a better experience for the people we serve.

Certifications

GT complies with all licensure requirements for delivering FMS. The company employs an in-house attorney and multiple Certified Public Accountants who maintain their licensure and participate in required continuous education.

The company has acquired two EINs for performance of FMS services as promulgated under IRS revenue procedure 70-6. The company complies with State, Local and Federal licensure/registration guidelines.

In November 2012 GT Independence became CARF accredited. CARF is an independent, nonprofit accrediting body whose mission is to promote the quality, value, and optimal outcomes of services delivered by companies like GT Independence. GT Independence has been awarded a Three-Year Accreditation for all services. This accreditation decision represents the highest level of accreditation that can be awarded to an organization and shows the organization's substantial conformance and commitment to the CARF standards. In 2015 the company's CARF accreditation was renewed for another 3-year period.

GT Independence is a member in good standing of Applied Self-Direction (ASD), formerly the National Resource Center for Participant Directed Services (NRCPS), and a regular participant in conferences and webinars supported by ASD. GT executives have served on various committees with ASD.

Recently, GT CEO John Carmichael chaired a subcommittee of ASD's Advancing Self-Direction Committee to look at the impact of proposed Medicaid Reform on people with disabilities and long term care needs.

Resources

The company relies on key resources to achieve excellent outcomes in delivery of Financial Management and Supports Broker Services.

Experienced Management Team – GT's executive team combines dozens of years of experience working with State HCBS programs. The team holds a comprehensive understanding of State and Federal policies that impact self-directed services: employment law considerations, trends in long term supports and services, best practices in health care privacy, prevention of fraud, waste and abuse, performance management and internal controls. The team approaches management from a diverse set of disciplines including social services, business, finance and law.

Technology – GT has invested in technology to spur operational efficiency and provide real-time support for stakeholders. Our web portal allows users to see real time budget information, download program documents and forms, and submit timesheets and service documentation. The Caregiver Link™ tool provides access to pre-screened workers for employers or potential employers who are recruiting. Our information technology is maintained by in-house development and infrastructure support staff who have built the system from the

ground up, giving GT the agility to quickly adapt to the changing environment. For example, the company has recently developed upgrades to our portal that make it fully compliant with EVV requirements in the 21st Century cures act.

Extensive Supports Brokerage Know-How – The Company has made supports brokerage the key feature of its service delivery model. Programs define supports brokerage along a wide spectrum of training, enrollment and technical assistance services. Whatever the parameters for a program's support brokerage function it is clear that self-directed arrangements do best when there is strong support at the point of enrollment and orientation to the program as well as good follow through with participants as they manage their arrangements. Our company has enrolled every single participant we have ever served through a company supports broker. We have arrangements where the broker plays an important role for a few weeks or a few months and even indefinitely. Our experience and diverse understanding of the role helps us deliver great supports brokerage service.

Program and Quality Management Systems

GT Independence manages company performance and compliance with contracts through an array of tools, processes and metrics.

The company focuses on document integrity through internal file audits conducted by members of the compliance and quality assurance team. We also regularly query our information system with a series of data integrity reports designed to find missing or incomplete data. The data integrity committee identifies opportunities to find and correct problems that lead to inaccurate data. Managers review metrics that measure the quality of the customer experience. Metrics like call center hold time, average time to close customer service requests and payroll error rates inform management's training and hiring strategies.

All major company functions including but not limited to supports brokerage services, payroll services, tax services, reporting and worker eligibility are documented in a policy, procedure and internal control.

GT Independence has successfully completed FMS readiness reviews multiple times.

GT Independence is committed to providing exceptional Financial Management Services to Medicaid and Veteran's programs and has successfully completed VF/EA readiness reviews within the past five (5) years. The following sworn statement from Kate Murray of Applied Self Direction provides confirmation of GT Independence's completion of a VF/EA Readiness Review and our qualifications to perform the scope of service functions outlined in the RFP.

“GT Independence passed an FMS readiness review to assess operational readiness to provide VF/EA FMS within the Veteran-Directed Home and Community Based Services Program. The readiness review was conducted by Mollie Murphy and Kate Murray on behalf of the National Resource Center for Participant-Directed Services, and GT Independence passed in August 2015. Mollie’s contact information is: Mollie Murphy c/o Applied Self Direction, 210 Broadway, #201, Cambridge, MA 02139, (617) 953-3914.”

(1) *Technical credentials of staff;*

Name	Role	Description	Qualifications
John Carmichael	CEO	<i>Execute the company’s strategic vision</i>	See Attachment A – Personnel Resumes
Holly Carmichael	COO	<i>Implementation Lead, Oversight of Operations Management</i>	See Attachment A – Personnel Resumes
Mike Miller	CFO	<i>Financial Administration</i>	See Attachment A – Personnel Resumes
Carmen Cardenas	<i>Tax Lead</i>	<i>Ensure proper filing of State and Federal Payroll Taxes</i>	See Attachment A – Personnel Resumes
Julie Beal	<i>Billing Lead</i>	<i>Ensure proper and timely submission of claims. Collect reimbursements and Fees</i>	See Attachment A – Personnel Resumes
Patrick Hoelscher	<i>Director of IT</i>	<i>Set up data exchanges; ensure system resources are available</i>	See Attachment A – Personnel Resumes
Christopher Taylor	<i>Director of Quality and Compliance</i>	<i>Contract Execution; oversight of complaints and critical incidents;</i>	See Attachment A

		<i>ongoing internal auditing and data integrity</i>	<i>– Personnel Resumes</i>
Adam Kujacznski	<i>Director of Marketing</i>	<i>Produce media to be used in outreach including printed materials, e-newsletters and other written communications, ensure compliance with State rules for customer facing materials, portal administrator</i>	<i>See Attachment A – Personnel Resumes</i>
Rob Lewis	<i>Director of Business Development</i>	<i>Develop GT supports brokerage procedures; staff supports broker team; supervise supports broker lead</i>	<i>See Attachment A – Personnel Resumes</i>
TBD	<i>Director of Supports Brokerage, Vermont</i>	<i>Management of all Vermont based Supports Brokers</i>	<i>Bachelor’s Degree with four (4) years of experience.</i>
TBD	<i>Operations Manager, Vermont</i>	<i>Management of all Customer Service and Payroll activities</i>	<i>Bachelor’s Degree with four (4) years of experience.</i>

Below are brief bios for GT’s Executive Team:

John Carmichael is the CEO of GT Independence. John is responsible for implementing GT’s strategic vision and advocating for the company and the thousands of people it serves. John has been with the company since its inception in 2004. During his time with GT, John has played a crucial role in growing the company and advancing the adoption of Self-Determination in Medicaid programs. John holds a BS in Business Administration from Trine University in Angola, IN.

Holly Carmichael, BSW is the COO of GT Independence and is responsible for the Operations of all Financial Management Services including Payroll and Customer Service. Holly has been working at GT Independence since 2006 and has been able to effectively improve both service delivery and customer satisfaction. Her dedication to person-centered services goes unmatched as she knows first-hand how important self-direction and choice is to individuals in need

of long term care. Holly obtained her Bachelor's degree in Social Work from Western Michigan University.

Mike Miller, CPA is the CFO of GT Independence. Mike is responsible for all aspects of the financial health of the company. During his time with GT, Mike has implemented programs to manage cash flow and optimize capital investment. Mike has been with GT since 2008, holds a BS degree in Accounting from Manchester College and is a Certified Public Accountant.

Adam Kujacznski is the Director of Marketing for GT Independence and leads all internal and external marketing for the company. Adam has been with the company since 2014 and is responsible for all company marketing and advertising efforts. Adam's core focus is on initiatives that drive stakeholder satisfaction and success through strategic process development and execution. Adam graduated from Michigan State University with a BA in Economics.

Christopher Taylor, JD is the Director of Quality and Compliance for GT Independence. Chris ensures that GT Independence complies with applicable laws, regulations, and contracts. Chris also manages projects to drive continual quality improvements at GT Independence. Since joining the company in 2014, Chris has obtained a 3 year CARF accreditation for GT Independence. Chris obtained his law degree from Michigan State University College of Law and has a BA degree in Economics from Hillsdale College.

Patrick Hoelscher is the Director of Information Technology at GT Independence. Patrick is responsible for the strategy, security and implementation of technology used at GT. Patrick has been with the company since 2016. Over his 10+ year career in IT management, Patrick has overseen numerous infrastructure and development projects for a global manufacturing enterprise. Patrick holds a BS in Computer Science from Trine University.

Rob Lewis is the Director of Business Development at GT Independence. Rob is responsible for developing new business opportunities and building strong relationships with existing stakeholders. Rob has been with the company since 2009. Rob has been instrumental in developing and training GT's field service teams throughout the country. Rob holds a BS in Marketing and Logistics from Central Michigan University.

(2) Vendor and assigned staff have demonstrated an ability to communicate with all levels and types of State staff as well as a wide range of employers, employees and participants who may have a variety of disabilities, cultural differences, and include individuals with limited English proficiency;

Communicating with People in Various Stakeholder Roles

GT's broad experience in provision of F/EA services has allowed the company to experience many different service delivery models, populations and program priorities. Through our experience we have developed an understanding of the various roles that exist within self-directed support arrangements and the best ways to communicate with people in those roles.

GT works with front line clinical staff including supports coordinators, care consultants and advisors to coordinate services. GT staff understand the role of the clinical staff in conducting the individual planning process, identifying services and issuing authorizations. We make efforts to collaborate with care coordinators through customer support and supports brokerage staff via phone and in-person trainings.

GT understands other administrative roles occupied by State or ISO Administrators. GT has developed the administrative functions that are necessary to efficiently interface with different State and can designate qualified liaison staff to collaborate on IT, Compliance and quality including contract monitoring and audits, escalated service requests, financial reviews, claims administration and record retention.

GT has also worked with many different people who experience disabilities and long term care needs in different ways through intellectual disabilities, physical disabilities, aging and mental illness. We recognize that different people have different needs based in part on their disabilities. However, we also understand and train our support and field services staff that the person's disability doesn't define them. There are many factors that affect how a person communicates including regional and cultural factors.

GT staff have experience working with caregivers in this environment. We understand the challenges that can sometimes be presented to caregivers in the system, the unique documentation requirement and qualifications that come with providing services. Caregivers require certainty about on-time payments in particular. GT staff are sensitive to the importance of this factor and are focused on removing payment obstacles.

Stakeholder Feedback

GT Independence has established Stakeholder Feedback Committees for the various programs and regions we serve. We value the contribution our stakeholders provide through this process. The Committee provides a venue for customers to give input on services delivered and assist in the development of annual performance improvement goals for the company. See Attachment B - Excerpt from Participant Feedback Committee Handbook

Communicating with People who Have Limited English Proficiency

GT regularly serves people who have many different communication needs. As we describe in the work plan, Section O; GT is able to assure everyone the ability communicate with us in their most acceptable way.

(2) Vendor demonstrates both technical skill to manage a FE/A service and customer service skills to support users after implementation;

GT Independence has been performing Fiscal/Employer Agent and Supports Broker services for 13 years since forming in 2004. The company has developed significant qualifications over that time frame, serving a diverse group of programs, delivery structures, participants and geographic settings.

Qualifications – Financial Administration

Experience in Financial Management Services

GT has developed broad experience in the delivery of Financial Management Services:

- The company currently serves over 100 distinct contracts with regional PIHP/PAHP agencies, State Medicaid Agencies and Commercial Managed Care Organizations.
- The company has developed large programs from inception and transferred in established programs.
- GT has developed comprehensive policies, procedures and internal controls and has been certified through multiple formal readiness review processes.
- The company has built an effective stable organization with 215 employees, while managing significant year-over-year growth.
- GT has developed a proprietary Information Management System that allows for efficient and accurate processing of the various information that is collected and used in execution of GT's contractual duties including retention of consumer, direct service worker, care coordinator, payroll, tax, service authorization, eligibility and budget data. GT has the ability to produce customized reports efficiently.
- GT has established a separate EIN for delivery of FMS services. We have built an effective tax processing function that efficiently and accurately produces required reports; calculates and pays taxes including State and Federal withholding (FICA, FIT, SIT), Federal Unemployment and State Unemployment (FUTA, SUTA); receives and processes notices from State and Federal taxing authorities and; stays up to date with changing tax laws.
- GT Independence has developed expertise in understanding and applying employment law to self-directed service arrangements. GT has provided technical assistance to programs when regulatory changes impact programs; For example, GT studied recent Federal Department of Labor interpretations in the Fair Labor Standards Act and disseminated important

information to program partners so they could make necessary program adjustments.

- GT Independence developed and implemented a state-of-the art online portal that provides an array of functionality to stakeholders, including an electronic timekeeping system that complies with Federal Electronic Visit Verification (EVV) requirements.
- GT has developed financial controls and processes that allow the company to successfully manage \$175 Million in Medicaid disbursements annually.
- GT Independence has developed customized approaches to serving populations across the United States. We provide Financial Administration services to stakeholders in the Country's West, Midwest, Northeast and South. We are committed to investing in States that grant us contracts and would open a regional office in Vermont, employing Vermonters to serve program participants.

Specialized Knowledge and Training

GT Independence staff have developed specialized knowledge related to self-direction, home and community based services and long term services and supports. GT staff hold a deep understanding of:

- The principles of Self-Determination
- Basic principles of Person-Centered Planning
- Trends in Long Term Supports and Services including
 - Trend towards Home and Community Based Services vs. Institutional Services
 - Trend towards Managed LTSS vs. Fee-for-Service
- HIPAA and HITECH as they apply to:
 - Participant privacy rights and protected health information
 - Information security and related compliance procedures
 - Electronic data interchange including EDI 837/835, 270/271, 834, etc.
- Tax filing procedures for FMS entities including:
 - Obtaining a separate EIN for the purposes of reporting payroll
 - Following applicable IRS publications and revenue procedures
 - Attaching Schedule R to 941 filings
 - Filing for State Unemployment and Withholding in the aggregate (where possible)
 - Filing IRS Forms 940, 941, 2848, 2678, 8821, W2, W3, 1099
- Relevant employment laws including:
 - Joint Employer Implications for self-directed programs
 - Rules for paying for sleep time
 - Rules for compensation of live-in caregivers
 - Rules for paying overtime and minimum wage depending and the applicability of the Federal companionship exemption
 - Tax exemption rules for family members
- Recent legislation on electronic visit verification and pending requirements.

- Best practices for preventing fraud, waste and abuse in self-directed programs
- Managing customer service requests that are common to self-directed programs
- Procedures and internal controls for accurately issuing payroll payments by the promised date and resolving documentation issues within the pay cycle
- Utilization management procedures including control of over and under utilization
- Helping participants understand monthly budget reports

Qualifications – Supports Brokerage Functions

GT Independence has been providing enrollment, orientation, training and support services since the Company first began operating. We have the knowledge and practical experience to deliver excellent Supports Broker Services.

On a day-to-day basis, across each State where GT provides services, GT Independence Supports Brokers, at a minimum, complete the following functions:

- Face-to-face enrollment meetings
- Assistance with scheduling
- Assistance with backup planning
- Management of payroll Issues
- Assistance with recruiting including job postings, accessing GT's proprietary recruiting database, development of a job description and interviewing
- Training of employers and employees on roles, forms, program rules and employer skills
- Hands on completion of employer and employee paperwork including standard forms, agreements and acknowledgements of policies

GT has developed a set of tools to facilitate these functions:

- Web based interactive training materials
- Employer and Employee specific (i.e. populated with Medicaid ID, GT assignment ID, etc.) downloadable forms from our secure web portal
- E-Enrollment functionality (web based, pre-filled enrollment documents executed through a mobile device)
- Document management system that pulls data from E-forms and automatically stores enrollment documents

As part of our performance of supports broker functions, GT has developed control documents that are used to monitor compliance with timeliness

standards. Internal oversight will be provided by the Director of Supports Brokerage.

In addition to their duties working directly with participants, Brokers are also required to contribute to MCO/Lead Agency outreach efforts including care coordinator trainings. Brokers also develop community connections and do outreach to advocates and consumer groups. Supports Brokers work from their homes and are geographically dispersed to allow statewide coverage.

Customer Service System

As indicated in the Work Plan, Section A, GT staffs a customer service function that is able to receive phone calls, voicemails, emails, faxes and mailed documents. The office is open during regular business hours (8 a.m. to 5 p.m. Eastern) and is open Monday-Friday except holidays.

GT will have a dedicated Customer Service Team for the State of Vermont who will operate to ensure that the Consumer's customer service needs are met. GT maintains a toll free number that Stakeholders will be able to call regarding any of their questions, which will route them to their Customer Service Team.

Our after-hours voice mail system will record calls to be responded to no later than the following business day. We ensure that appropriate staffing ratios are met by monitoring our customer satisfaction metrics to make certain that Consumers are receiving the assistance they need on an ongoing basis.

Stakeholder Satisfaction and Feedback

GT traditionally has high satisfaction rates:

Satisfaction Rates	2014	2015	May-16	Nov-16
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Participant Satisfaction - All States

I would recommend GT Independence to a friend or family member who wanted to use a fiscal intermediary.	91%	92%	93%	95%
Overall, I am satisfied with the services I receive from GT Independence	92%	92%	93%	96%

Caregiver Satisfaction - All States

I would recommend GT Independence to a friend or family member who wanted to use a fiscal intermediary.	90%	90%	92%	94%
Overall, I am satisfied with the services I receive from GT Independence	90%	90%	92%	96%

See Attachment C – 6-08 Call Response Time

(3) References from previous work: vendor may append references but the State reserves the right to make direct contact with references

Community Living Services of Oakland County

GT Independence operates as a Financial Management Service provider for Community Living Services of Oakland County for the past 11 years and currently serve over 1200 individuals. GT issues reimbursements to direct hire employees, vendors (for goods and services), and to Independent Support Coordinators. GT Independence provides a dedicated field service representative to enroll individuals face to face and a dedicated customer service team to ensure excellent service. Community Living Services of Oakland County maintain monthly conference calls to ensure program rules are followed. GT Independence provides monthly budget reports to Community Living Services of Oakland County and the individuals to ensure everyone is up to date on spending. GT Independence submits claim through an electronic 837.

Contact Information:

Community Living Services of Oakland County

Annette Downey

(734)645-7080

adowney@comlivserv.com

HUMANA - Medicaid Long Term Care Program - Participant Directed Option

GT Independence has successfully served individuals in Florida through Humana’s Medicaid Long Term Care Program - Participant Directed Option for the past 4 years. Our approach to supports brokerage, collaboration with case managers and coordination of background check services have been keys to the success and growth of the program. The program is experiencing significant growth and has doubled in the past year. GT currently serves 900 participants

through HUMANA in Florida. GT Independence received 100% satisfaction on our 2016 Participant and Caregiver surveys for the State of Florida.

Edward Miller

Manager, LTSS Provider Relationships and Contracting
Humana Long Term Care
(305) 804-8394
Emiller13@humana.com

Community Link, Inc

GT Independence has been operating as a Financial Management Service provider for Community Link, Inc for the past nine years and currently serves approximately 600 individuals. GT Independence has been a partner with Community Link, Inc in transitioning individuals from one FMS to GT Independence as they have continued to expand in to additional counties in Wisconsin.

Contact Information

Community Link, Inc
1407 St. Andrew St.
La Crosse, WI 54603
Jill Flugar
(715)204-1760
jill.flugaur@communitycarecw.org

See Attachment D – Reference Letters

b. Fulfillment of Schedule and Volume of Payroll

- i. Demonstration vendor can fulfill the schedule and volume of the payroll including:*
- (1) The management of multiple programs, some with various options for services and payment methods;*

GT Independence currently serves roughly 13,000 participants in 9 states. We handle \$175 Million in Medicaid dollars annually. We have the capacity and technical sophistication to provide excellent service to the programs in Vermont.

GT Independence has been performing fiscal employer agent services for dozens of programs, including multiple Medicaid programs, for more than thirteen (13) years, beginning in 2004. These programs represent a wide range of risk models, Medicaid waivers, populations served, sizes and overall program objectives. GT Independence offers a wide-range of payment options in each program including direct deposit, payroll debit card, and check. See Attachment E – Table of Programs

(2) Efficiently and effectively providing services to relatively small numbers of individuals per program;

GT Independence has systems in place to efficiently and effectively provide FE/A services to programs of any size. The company has a proven track record of collaborating with states and programs to implement and grow self-directed programs starting from as few as one individual.

GT Independence has developed proprietary software that enables the company to implement program specific policies and procedures, payroll processes, utilization management policies, and reporting requirements regardless of program size.

GT Independence maintains internal customer service systems that allow for our Customer Service Associates (CSAs) to easily serve multiple unique programs. CSAs undergo an intensive six week training period upon being hired which includes program specific training for individual programs that they will serve. When a participant calls GT they are automatically routed to the team of CSAs assigned to their program to ensure they receive a quick and accurate resolution to their call from a CSA that is knowledgeable and trained according to their program guidelines.

Upon contract award, GT collaborates with states and programs through a business development process to develop business rules governing FE/A duties that are unique to each program that we serve. These business rules ensure that program participants are able to successfully self-direct their services in accordance with program guidelines and have equal access to support services regardless of program size.

(3) A process for addressing employer documentation that does not meet standards including but not limited to:

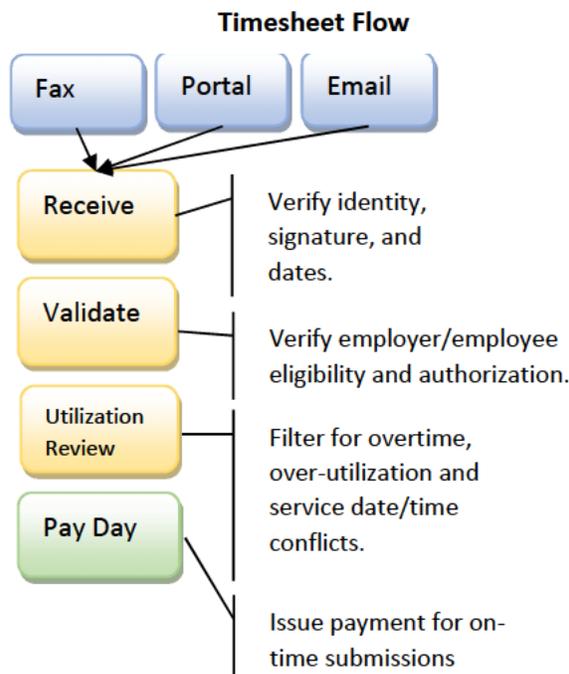
(i) Missing employer or employee signature;

GT Independence has implemented processes and policies to ensure that employer submitted documentation includes all necessary information including employer and employee signatures. Each timesheet submitted to GT Independence undergoes multiple reviews. If timesheets do not have required signatures then the employer and employee are notified and are requested to correct the error and resubmit the document. Similarly, if there are other forms and agreements that do not contain required signatures then these documents are reviewed and sent back for proper completion with an explanation to the employee and/or employer of what needs to be corrected.

GT has also implemented online timesheets and electronic enrollments that require signatures to be completed before the documents can be submitted.

(ii) Submission after vendor defined submission timelines;

GT Independence develops Utilization Management policies with agencies detailing actions to be taken in response to submission of late timesheets. GT will collaborate with Vermont in developing these procedures as well. All employers and employees are made aware of submission requirements upon enrollment and annually through a payroll schedule. If timesheets are submitted outside of their deadlines then they are placed in our pending roster and processed with the following scheduled payroll. This encourages the submission of paperwork according to the payroll schedule.



(iii) Billing in excess of authorized hours or dollars;

GT’s system is robust in its ability to manage utilization against authorizations. Our system imports authorization documents and measures utilization against the authorizations based on timesheets submitted by the employers and employees. If timesheets submitted would cause an employer to exceed their authorization then the system notifies the Customer Service Associate to hold payment and the employer and Case Manager are contacted. GT also maintains flexibility in the tracking of utilization management such that the Case Manager and employer can be contacted if an employer is on track to exceed the authorization based on monthly usage. This is delineated in the utilization management policy that will be developed between GT and Vermont.

(iv) 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.

GT takes the position that it is our duty to serve everyone who chooses us and to help them be effective at self-direction. We employ some additional tactics for our participants who require more support:

- We increase care coordinator communications.
- We look for warning signs that could indicate fraud, abuse or a generally unsafe/unsuccessful caregiver relationship.
- We get proactive about making it work. (For example we put some people on a “watch list” and if we haven’t received timesheets, we call.)

While we approach every situation with the hope that the individual will be successful, we know that self-direction isn’t for everybody. When there are situations where fraud or abuse are likely, we will raise our concerns with care coordinators and offer to transition into a more traditional model. It has been our experience that it’s rarely necessary to do this.

c. Demonstration that vendor can operate in Vermont

- i. The vendor describes ability to have a physical presence in Vermont that can provide a full range of service to employers, participants and employees;*

GT Independence currently performs FE/A services from operational centers in Michigan, Wisconsin, and North Carolina and has the ability, resources, and experience to establish additional offices in other states.

Upon contract award, GT Independence will establish an office in Vermont to provide a full range of services and be accessible to employers, participants and employees.

- ii. The vendor has staff in Vermont with sufficient authority to work with the State around the daily operations of the FE/A services.*

GT will hire personnel in Vermont to provide services to stakeholders in the State and with sufficient authority to work with the State around the daily operations of the FE/A services.

GT will staff at minimum the following Supports Brokers and customer service associates for the state of Vermont:

Name	Role	Description	Qualifications
To Be Determined	Operations Team Leader (2)	Supervise Operations team which performs customer service, payroll and compliance functions, Report to Operations Manager	See Attachment F – Job Descriptions
To Be Determined	Operations Associates	Perform operations duties, report to Operations Team Leader	See Attachment F – Job Descriptions
To Be Determined	Director of Supports Brokerage	Act as supervisor and subject matter expert for Vermont's Supports Brokers	See Attachment F – Job Descriptions
To Be Determined	Supports Brokers	Conduct supports broker functions	See Attachment F – Job Descriptions

- d. **Demonstration that the vendor has software which accommodates all program accounting needs and can be modified as needs change**
- i. *Vendor must demonstrate that the software used by the vendor can accommodate all program needs and that the vendor has the capacity to modify the software if/when needs change. This includes, but is not limited to the management and processing of:*

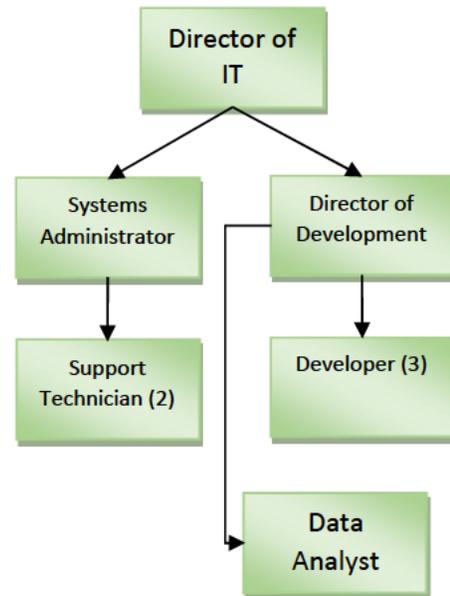
System Overview

GT's operates a robust, highly customizable information system. The system consists primarily of proprietary technology that was and continues to be developed in-house by GT's IT team. We have integrated 3rd party applications where appropriate to do some basic functions such as e-mail and call routing. The system has the capacity to perform all necessary FMS functions including claims and reimbursement, taxes, worker's comp administration, patient share, overtime and sick leave.

GT's data systems are built on a Microsoft SQL platform. Software applications are modular and can be customized based on an established set of business rules, allowing GT the necessary flexibility to operate in over 100 different self-directed programs. The system utilizes MS Dynamics for core general ledger and payroll functions. Information is integrated seamlessly between Dynamics and other company developed applications.

Company IT Personnel

GT's Information Technology Team consists of four (4) Developers, three (3) Systems Support Staff and one (1) Data Analyst, reporting to the company's Director of IT. The team provides software development and support, help side user support, infrastructure support including hardware security and maintenance, server administration, disaster recovery, IT capacity planning, networking optimization, mobile device support, web support, reporting, and data integrity analysis. The company has made significant investment in IT staff and systems, which has allowed us the flexibility needed to quickly modify, customize and enhance systems. We have almost no limitations on changing our information systems because 90% of the functionality was built by GT.



System Infrastructure

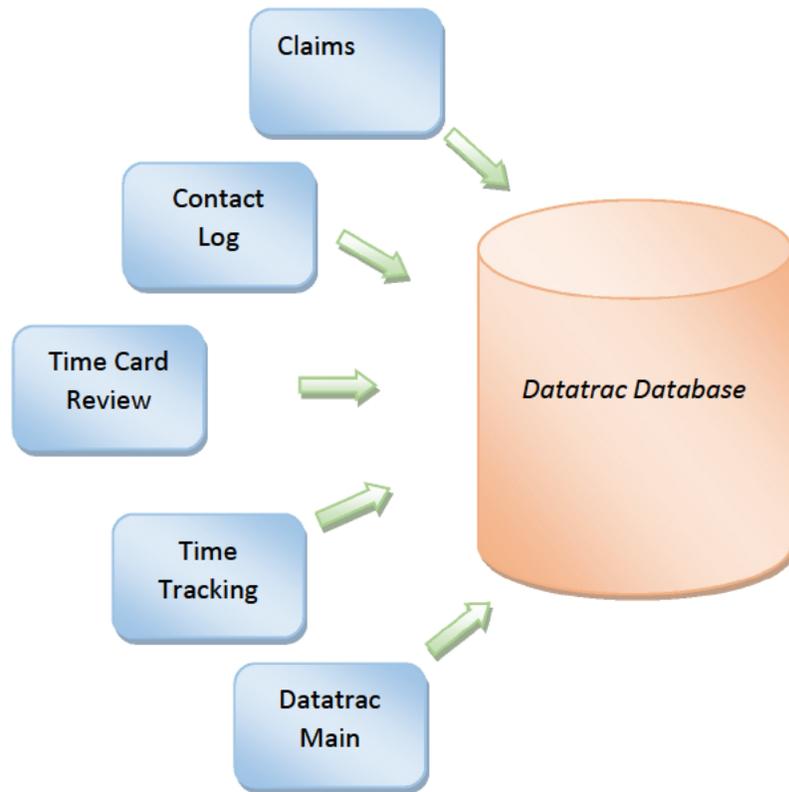
The company utilizes an array of infrastructure to support the information system, called Datatrac™ This includes company owned on-site hosting as well as cloud hosted functions, user terminals, mobile devices, cabling and networking hardware.

Software Configuration

GT's information system has several user input modules that can be configured to address program specific rules:

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Each module controls a different aspect of GT's contractual requirements:



Module Name	Function(s)	Customization Factor(s)
Claims	Apply program billing rules to payroll data and convert to Medical Claims.	Claims module outputs can be modified to fit format and calculation requirements.
Contact Log	Record service request information received through call center via phone, fax, email or U.S. Mail, track status of service requests, collect trending data.	Ties stakeholder to correct program and allows operations staff to provide effective support in real time, using specific program parameters.
Time Card Review	Interface for quickly examining service documentation. Operations staff connect a timesheet to participants in the system and analyze the timesheet based on documentation	Operations staff can annotate images with specific instructions based on business rules.

Module Name	Function(s)	Customization Factor(s)
	rules. Staff screen for documentation issues like missing signatures, illegible service data and potential fraud indicators (use of white out, pre signed timesheets, etc.).	
Time Tracking	Review service data from online time entry system, faxed, emailed or mailed timesheets and transfer service data to Datatrac through manual entry or upload.	Filters are applied based business rules to address: over/under utilization, overlapping service time, unauthorized services/payments, ineligible participants, ineligible employees, over 24 hours in a day, and overtime.
Datatrac Main	Users Enter Participant and Provider Demographic info, Authorization info, State/ISO level info and program specific business rules including: utilization management rules, employee eligibility rules, claims and billing rules, service documentation rules and payroll schedules.	System can be customized to receive data through many different transmission methods including manual entry, file import and data feed.

Critical FMS Functions

GT's information system allows the company to perform critical FMS functions for over 100 programs. Each program has specific parameters that control the payroll, taxes, employee and participant eligibility, utilization management, customer support and enrollment services. Below is a high level description of the process for meeting the critical functions identified in the RFP.

Critical Function	Primary System Tool(s)	Methodology Applied to Function
Claims Reimbursement and	Claims Module	Claims module cross references Data from completed payments against billing rules and authorization data to create a formatted claims file that contains typical elements like units, service code and modifiers. Module records and tracks claims on an individual basis.
State and Federal Taxes	Datatrac Main, MS Dynamics	GT staff enter Employer and Employee specific payroll info (exemptions, withholding, etc.) into D/T Main at enrollment. As payments are made to workers/vendors, MS Dynamics calculates withholding and produces reports for filing and payment of State and Fed taxes.
Unemployment and Worker's Compensation	Datatrac Main, MS Dynamics	GT staff enter/update unemployment and worker's comp data in Datatrac Main. D/T Main transfers data to MS Dynamics which sets up employer contributions that are calculated, filed and paid as payments are made to vendors/workers.
Patient Share	Claims Module	Claims module records patient share of claim on claim lines and sets up separate invoicing.

Employee Overtime	Time Tracking Module	T/T Module filters service data and kicks out timesheets that result in overtime. GT staff review exception timesheets and take appropriate action based on OT policy.
Employee Sick Leave	Time Tracking Module	Employees claim sick time in service documentation and GT payroll system records sick time usage against budget (like any other budgeted item). Accrual of one hour for every 52 hours worked is accounted for on each employee-employer relationship.

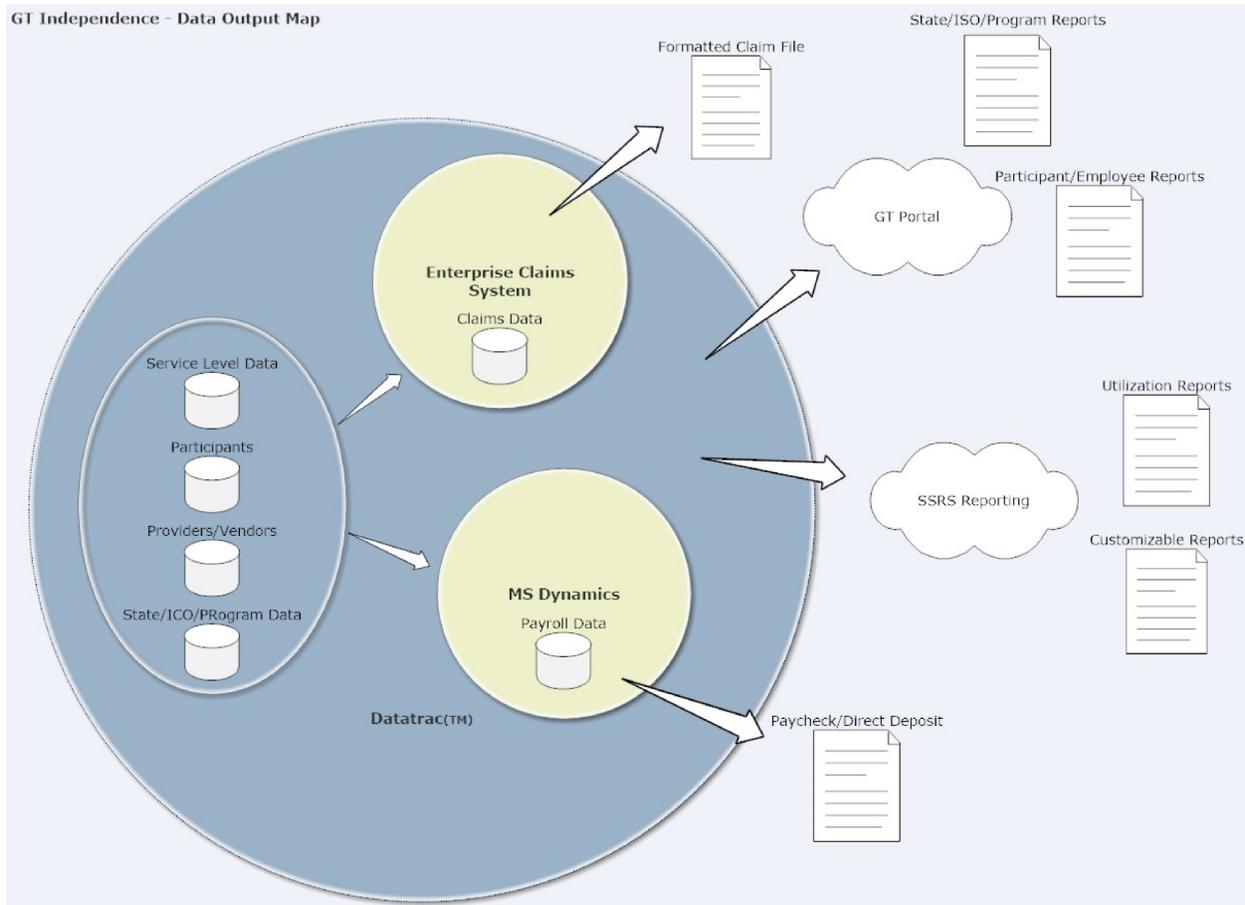
ii. *Vendor must demonstrate the ability to produce reports as needed for the State and other entities approved by the State.*

GT's system is highly customizable. Data can be used to create reports in a wide variety of formats, using a wide variety of data fields. Reports can be delivered via secure file transfer or with varying levels of restricted access through the GT web portal. The company uses dozens of reports internally to ensure data integrity and trend data. We can customize these reports and make them available based on program requirements.

GT has standard reports (Individual Monthly Budget Report, Aggregate Utilization Report) that are used through the web portal. The company, as part of the contracting phase, will develop a suite of regular reports per the State's request. GT will also produce ad hoc reporting at no cost provided that the development time is less than 2 hours. See below for a chart that shows GT's data output flow.

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Datatrac Output



Standard Reporting

The two standard reports that GT produces through the GT portal are:

Individual Monthly Budget Report – This is a graphical representation of an individual’s authorized services, the amount of service used in terms of dollars and units of services, the amount remaining and the pace of utilization for the authorization period.

The report is available in real time through the individual’s portal account.

Aggregate Utilization Report- This report shows the total utilization across an entire program. It lists service authorizations by participant and shows authorized services vs. used services on a units and dollars basis. It is a way to quickly see utilization rates for the total program and to identify individuals who may be over or under utilizing.

Customized Reporting

GT can develop customized reports for regular delivery based on specific program requirements. We can make the reports available through the portal and restrict them to certain State/ISO/Program personnel based on role. Some examples of customized reports that are available:

- Program Employee rate of pay (all employees rates of pay for the entire program)
- Participant Status Report (active, inactive, pending, etc.)
- Hospitalization Report (participants who are currently inactive due to hospitalization)
- Missing Data Reports (participants and/or employees who are ineligible due to missing paperwork)
- Authorization Utilization (participants and the amount of authorization utilized; can be customized by dollars or units and by a percentage over or under based on weekly, monthly, auth-to-date, or total authorized amount)
- Last Service Date (participants last date of service as well as last pay date of their employee(s))
- Authorization Expiration (participants and their authorization expiration dates; can be customized to only display authorizations expiring in the next 30, 60, or 90 days)



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Work Plan

A. Working with Employers and Employees:

Supports Brokerage

GT Independence will employ representatives to provide face-to-face enrollment, orientation and training services to participants, representatives, workers and other stakeholders. We describe these training services in more detail in Section O of the work plan.

Customer Support

In addition to supports brokerage services, GT supports participants and employees through its customer support department. Support team members are dedicated to making Self-Determination and self-directed arrangements work for the people we serve. Support staff work very hard to make sure that people have a positive experience with GT and with self-direction. Their primary focus is ensuring that workers are paid when they expect to be paid – timely and accurately.

The customer support center is able to receive phone calls, voicemails, emails, faxes and mailed documents. The office is open during regular business hours (8 a.m. to 5 p.m. Eastern) and is open Monday-Friday except holidays. The support team's function is to track and resolve open service requests, monitor complaints, provide assistance with day-to-day employer functions and problems that may occur related to the payroll process. Support teams track key performance indicators to ensure high service levels.

Customer support team members receive extensive training. During their first week with the company, support team members participate in an orientation process where they are acclimated to the work they will be doing. At orientation, GT trainers discuss the history of disability rights, person centered planning, self-determination, cultural diversity, the rights of individuals to be free from neglect and abuse and other similar topics.

After orientation support team members receive further training on the specifics of their role. This includes training on providing phone support, logging customer calls, fulfilling routine services requests and conflict management. Team members learn to use the Datatrac system and receive specific training on the business rules for their assigned program(s).

The support team tracks a number of metrics to ensure the highest possible level of service. Performance is monitored through the following Metrics:

Metric	Standard
Average Speed of Answer	< 30 seconds
Oldest Open Support Request	< 24 hrs.
Payroll Dollars paid off cycle due to GT Error	< .5% of total payroll
Participant Satisfaction	96%

The operations group is constantly reviewing support data to find trends in service requests and clues about ways to improve the individual experience.

B. Authorizations and Program Limitations:

GT Independence's proprietary software system DataTrac allows for program specific utilization management which accommodates the budget models and service allocation types listed in the RFP.

Utilization Management

Upon contract award GT Independence will collaborate with State personnel, as part of the business development process, to establish program utilization management policies which are specific to Attendant Services Program (ASP), Children's Personal Care Services (CPCS), Choices for Care (CFC), Developmental Disabilities Services (DDS), and Traumatic Brain Injury Respite (TBI). Utilization management policies detail spending limitations, budget carry over, tracking budgets by units or dollars, over authorization handling, and other details on how participants in each program can spend their budgets. Please see Attachment G - Draft Attendant Services Program (ASP) Utilization Management Policy

Business Rules

Once utilization management policies have been approved by the State/Program, GT finalizes business rules for each program for use in day to day operations. Business rules define how GT Independence personnel apply the program utilization management policies and govern all FE/A functions. Items such as confirming Medicaid eligibility, handling of overtime payments, and limitations on hours worked and rate of pay for employees are examples of common items in

business rules. Business rules are stored in the DataTrac system and are accessible by customer service associates and payroll staff for easy reference.

Authorizations

GT Independence tracks participant service authorizations in DataTrac and applies all payments issued on behalf of a participant to authorizations by approved service codes. DataTrac allows for a variety of budget models and authorization durations including weekly, bi-weekly, monthly, and annual. GT accepts authorizations in a variety of formats and transfer methods including data import, secure FTP, spreadsheet, secure email and paper/fax. Upon receipt, authorizations are uploaded into DataTrac and tied to the participant account with a unique budget identifier and service dates for when the authorization is active.

Upon contract award GT Independence will work with State/Program staff to identify and agreed upon format and delivery method for Authorizations.

C. Billing Agent for Family Directed Hi-Tech Nurses

GT understands the requirement for acting as billing agent for Family Directed Hi-Tech Nurses. GT will complete setup tasks in the company's Datatrac system to establish separate billing rules for these providers. GT will submit claims on their behalf and follow up on any claims issues that may occur.

GT Independence will receive timesheets from nurse-providers through all standard timesheet submission methods. Accepted methods are through EVV, GT Online Portal, Email, Fax, and US Mail.

GT Independence will process nurse-provider timesheets according to criteria established by the State and documented in program utilization management policies. During processing timesheets will be reviewed to ensure that all minimum acceptable criteria are met.

GT Independence payroll team process timesheets and tracks hours against approved participant authorizations. Our software system runs a series of utilization checks prior to converting the timesheet for billing. GT exports claims in a format accepted by DXC.

GT billing team submits claims per required claims submission guidelines¹, provides records to support claims, reconciles discrepancies, and works through outstanding claims.

GT Independence has processes in place for monitoring acceptance of claims and for resolving issues with outstanding / unaccepted claims. Upon contract award GT Independence will create policies and procedures for monitoring the processing of nurse-provider claims and notifying nurse-providers of claim issues.

D. Patient Share: *The vendor shall demonstrate the ability to manage the Patient Share process in Choices for Care by:*

1. *Billing participating employers any Patient Share payments as determined by DVHA.*

GT's claims management software is able to track claims based on patient vs. payer responsibility. The system is able to do individual invoicing and reporting both to the patient and payer on the status of patient share claims.

2. *Tracking the amount of Patient Share withheld by Medicaid.*

GT will set up our claims module to apply patient share amounts to the "patient responsibility" portion of claims. GT will develop procedures for applying remittance advice to outstanding claims and properly recording payer share vs. patient share.

3. *Managing and tracking Patient Share notices from the DVHA.*

GT operations staff will receive and process Patient Share notices from the DVHA. Operations staff will record individual patient share status in the Datatrac system. Billing staff will use this information to track patient responsibility for claims.

4. *Where necessary, interacting with other service providers to ensure the "highest paid provider" determination accurately reflects the collection, withholding, and payment of Patient Share.*

GT billing staff will interact with other providers to ensure the accuracy of the highest paid provider determination. GT staff will receive training on Vermont

¹ GT's claims system can submit a claims file in any common format (CMS-1500, 837p, 837i, XML, .csv, etc.)

rules regarding highest paid provider, including processes for submitting patient share claims and rules set forth in the provider manual (i.e. Section 12.3 of the Vermont Medicaid Provider Manual).

E. Payroll Reports:

Budget reporting keeps participants and their case manager informed of utilization and spending and helps give the participant the ability to control and manage their service units and/or dollars. GT's DataTrac system allows for robust budget reports that meet State/Program requirements. The following are examples of fields which are available on monthly budget reports:

- Dates of Service
- Dollars / Units Spent / Paid
- Dollars / Units Balance Remaining
- Service Codes
- Hours Worked in Period
- Historical Usage

Management ensures performance of key elements required in financial administration and supports brokerage. GT develops management reports as required in the contract and works with State/MCO liaisons to transmit reports.

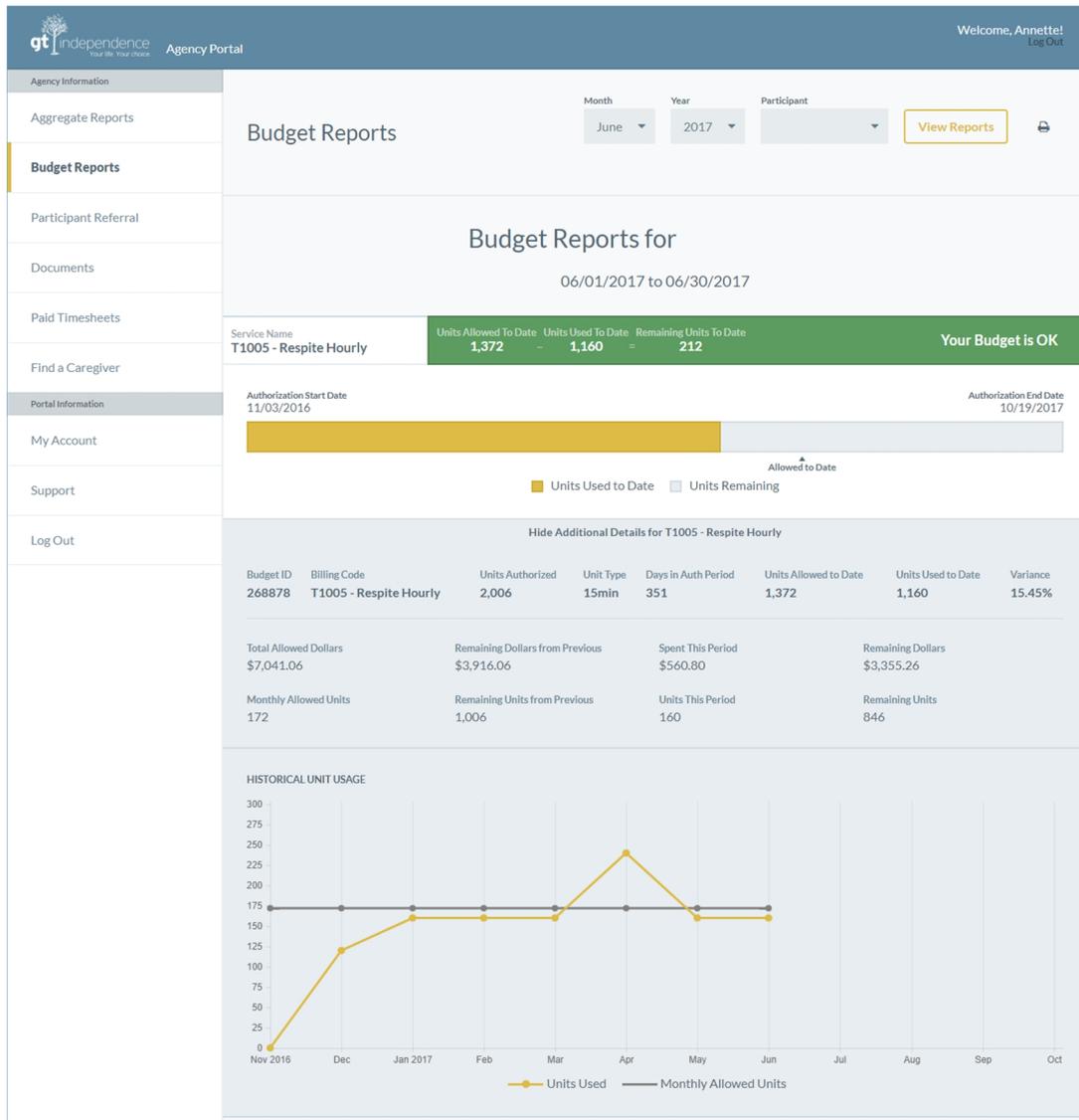
Online Budget Reporting

GT Independence worked with stakeholder groups to develop an innovative budget reporting format that provides a robust set of data in an easily understandable style. Online budget reports are available to participants and agency staff through their GT Portal accounts online and are updated in real-time after each payroll disbursement. Budget reports are also mailed to participants.

GT Independence will work with Vermont Stakeholders in each unique program to develop a report format that is easy to read and best fits the program parameters. GT Independence will submit formats to the State for approval.

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Sample Budget Report



F. Unique Identifier:

GT Independence will obtain a unique Employer Identification Number (EIN) through Form SS-4 for each individual participant employer and ensure all tax

reporting at the federal and state level is performed according to current regulations.

GT Independence has acquired a separate EIN for performing F/EA duties. We have researched Vermont withholding and unemployment rules and determined that we currently meet requirements to provide F/EA duties under Vermont law.

G. Qualifying as the Fiscal Agent:

For each individual served, GT Independence will secure Federal and State approval to perform Fiscal/Employer Agent functions by:

- Executing IRS 2678 Request for Approval Letter and IRS Notification of Approval)
- Executing IRS 8821 Tax Information Authorization
- Executing State Form C-50 Vermont Department of Labor, Limited Power of Attorney and Tax Information Authorization
- Executing State Form BR-400 Vermont Department of Taxes, Application for Business Tax Account
- Executing State Form BR-400A Vermont Department of Taxes, Business Principals with Fiscal Responsibility
- Executing State Form BR-400B Vermont Department of Taxes, Account Application

During the Implementation project, GT will create an employer packet which will contain these forms which can be pre-filled, then signed by the Participant. The packet will also contain all other necessary agreements (including the service agreement), notices and forms that the Participant needs to sign in order to begin directing services.

Completion of the employer enrollment packet will be facilitated by the Member/Person Supported's Supports Broker. Please see Attachment H - 6-12 Consumer Enrollment Meetings

GT Independence will not submit above documents to the IRS or other agencies without approval to do so by the State.

H. Withholding and Judgments:

GT Independence has policies and procedures in place for determining individual's employment status and ensuring that employers share of all taxes dues are withheld, filed, and paid on time and in full. Where necessary GT Independence will file IRS Form SS8 – Determination of Worker Status for Purposes of Federal Employment Taxes and Income Tax Withholding to verify the status of a caregiver.

GT's process for withholding assures that all Federal, State and Local Tax Documentation is completed for F/EA and Participants in accordance with IRS guidelines.

See Attachment I – 6-24 Processing Tax Filings

I. Garnishments:

GT Independence has policies and procedures in place to ensure all judgements, garnishments, tax levy, and other related holds on worker's wages, received by GT Independence on behalf of Participants and their Employees are recorded and paid as deemed possible. Our accounting software and DataTrac system allows for the accurate tracking, withholding, and payment of all garnishments and related holds on worker's wages in accordance with local, state, and federal laws.

See Attachment J – 6-25 Garnishments

J. Background Checks:

GT Independence has reviewed and will perform background checks in accordance with DAIL's Background Check Policy.

GT's criminal background procedure will include the following checks:

- Verify that the worker is age 18 or older
- Complete a review of the Department for Children and Families Child Abuse Registry
- Complete a review of the Department of Disabilities, Aging and Independent Living Adult Abuse Registry
- Conduct a criminal background check through the Vermont Crime Information Center which includes the sex offender registry
- Conduct a review of the Federal Exclusions Databases HHS-OIG LEIE check
- Conduct a GSA SAM check
- Conduct a Motor Vehicle Driver Record Check when applicable
- Regularly submit list of active employees to the State

Background Checks will be conducted at the time of hire and when requested. The employee eligibility policy will include procedures for verifying the factors above and identifying any excluded providers. Results will be reported to the Participant so that they can make an informed hiring decision and apply for a Variance if desired and required.

If at any point an active Employee is found to be ineligible due to their background or exclusionary list results, GT Independence will make appropriate notifications the Employer and Employee and cease payment as of the date notified. Services cannot begin being provided until all background check requirements are met.

All criminal background check results will be maintained in the worker's file.

K. Accepting Timesheets:

Participant employers and their employees are trained upon enrollment by the Supports Broker on timesheet completion and submission. GT Independence encourages electronic submission but accepts timesheets through US Mail, fax, email, online portal, and EVV systems to ensure that all employers and employees have a convenient method for submitting service data. Self-addressed postage paid envelopes are provided to participants upon request.

GT Independence retains copies of all timesheets in compliance with Medicaid requirements established by CMS and makes copies of all timesheets available to case managers through agency portal accounts.

The GT online portal or EVV systems is optimized to reduce utilization and data errors that can cause delays in processing and payment of timesheets. GT encourages employers and employees to submit timesheets electronically through the online portal and EVV system to increase timeliness and accuracy of service data.

See Attachment K – 6-14 Receipt of Time Reports

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Time Entry View

Pay Period	Employee	Actions
November 16, 2016 - November 30, 2016	Cg Demo	Review Timesheet
March 1, 2017		Review Timesheet

Date	Time In	Time Out	Service Code	Hours
November 16, 2016	08:00 AM	02:00 PM	01	4.00
November 17, 2016	08:00 AM	02:00 PM	01	4.00
November 18, 2016	08:00 AM	02:00 PM	01	4.00
November 19, 2016	08:00 AM	02:00 PM	01	4.00
November 20, 2016	08:00 AM	02:00 PM	01	4.00
November 21, 2016	08:00 AM	02:00 PM	01	4.00
November 22, 2016	08:00 AM	02:00 PM	01	4.00
November 23, 2016	08:00 AM	02:00 PM	01	4.00
November 24, 2016	08:00 AM	02:00 PM	01	4.00
November 25, 2016	08:00 AM	02:00 PM	01	4.00
November 26, 2016	08:00 AM	02:00 PM	01	4.00
November 27, 2016	08:00 AM	02:00 PM	01	4.00
November 28, 2016	08:00 AM	02:00 PM	01	4.00
November 29, 2016	08:00 AM	02:00 PM	01	4.00
November 30, 2016	08:00 AM	02:00 PM	01	4.00

L. Processing Timesheets:

GT Independence has established policies and procedures in place to ensure that all service documentation meets established guidelines before payment is issued to an employee. The processing of a timesheet begins when we verify that we have received an appropriate document authorizing us to remit payments. There are several steps that must be completed to verify a document's appropriateness and the disbursement team completes those steps.

The processing of timesheets / service data includes:

1. GT receives a timesheet/invoice/service documentation via EVV, Online Portal, email, fax, or US Mail.
2. Payroll staff review and verify that the timesheet/invoice/service documentation contains all required items including service code, Participant/Employee IDs, names, signatures, pay period, date and times of hours worked, and any other program requirements.
3. Timesheet/invoice/service documentation is rostered and associated with the appropriate account in the GT database so it is searchable by CSA's for Individual and employee verification.
4. Payroll staff review and verify that the timesheet/invoice/service documentation data has been entered and calculated correctly.
5. Payroll staff enter data from the timesheet/invoice/service documentation into the database to accurately time track for each employee.
6. Proprietary technology cross references the timesheet/invoice/service documentation data against specified authorization parameters defined in the program utilization management policy (authorization period, units authorized, overlapping time with another provider, watchlist, Medicaid eligibility).
7. Once timesheet/invoice/service documentation data is verified and approved it moves into the payment processing queue.
8. If timesheet/invoice data is denied it is immediately forwarded to customer service and contact is made with Individual/employee and / or Case Manager for correction as defined by the program business rules.
9. Providers and employees who frequently have timesheets rejected for failure to adhere to program rules and guidelines may be added to a watchlist for additional review prior to payment. Participant's case manager, consultant, or service coordinator is notified of frequent or ongoing problems and issues of non-compliance.

Operations Managers monitor key performance indicators to ensure that GT is issuing payments accurately and timely. Managers regularly review reports for individuals on watchlist and can provide frequent issue reporting to program staff. GT Independence will customize the GT's web portal to show payroll information for workers (pay stubs) and participants (utilization reports).

M. Payment to Employees:

- 1. Have a process to answer questions and to provide information regarding payroll matters to employees, employers and participants.*

GT Independence provides support through several methods:

- GT employs support brokers who assist with face-to-face enrollment services. Brokers conduct setup activities and training with each participant and their employees, ensuring that self-directed arrangements start with stakeholders who understand their roles, program processes and requirements.
 - GT operates a customer service center that can receive communication through phone, fax, email and U.S. mail. GT staff respond to support requests, answer questions, send information and paperwork to stakeholders and interface with program clinical staff to ensure smooth program operation. GT tracks support staff performance through key performance indicators like call hold time and age of open issues.
 - GT has developed a state-of-the-art web portal for delivering program information and resources. The portal allows stakeholders to view utilization reports, enter service data, download forms and learn about program rules. Program staff can also view management reports.
- 2. Upon the receipt of a properly completed timesheet, process payroll in a manner to ensure payment to employees on a schedule approved by the State. The schedule for payment shall be every two weeks.*

GT operations staff process properly completed timesheets by using the Time Tracking function in the company information system. Team members enter timesheet data and process payroll payments according to an internal payroll schedule. This process is monitored through internal control documents including the payroll checklist, which require that processors verify the accuracy and timeliness of their work according to strict standards. Operations Managers

and Team Leaders ensure that the process is working properly and apply resources to ensure on-time completion of payroll.

During the setup phase, GT will develop documents including a bi-weekly payroll schedule, timesheet form and instructions for completing service documentation. These documents will be presented to stakeholders and used as the basis for ensuring orderly completion of bi-weekly payrolls.

See Attachment L – Payroll Schedule M that complies with Vermont payroll laws.

3. *Have a process to allow for the payment of a timesheet outside the standard cycle when the vendor has failed to pay the employee during the standard schedule due to vendor error, vendor system problems, or due to State error.*

GT Independence has processes for issuing payment outside the standard payroll cycle. The system tracks these payments and records reasons for them. GT reviews this payment data and engages in quality improvement to minimize the occurrence of these payments.

Submissions that do not meet all requirements will be handled in time to issue payment on payday if possible.² GT will issue payments outside the payroll cycle if necessary. Examples of exceptions include but are not limited to:

- Employee Eligibility Issues
- Participant Program Eligibility Issues
- Authorization Renewal Issues
- Timesheet Errors and Omissions
- Issues with Data Transferring from an EVV system
- Failure to submit a timesheet

GT's systems have the capability to process a same day payment if requested and authorized. If for some reason payment cannot be made or resolved on time for payday then notification is made to the participant and worker to alert them to a partial or non-payment.

By practice, GT will not issue a payment outside the standard cycle when employees have submitted timesheets after the due date, but when any other mitigating circumstance prevents timely submission, GT makes efforts to issue payment as quickly as possible.

² GT is almost always able to get corrected service data in time for pay day. Operations teams track requests for Payment outside the pay cycle (RFP's) very closely and work hard to minimize their occurrence.

4. *Have a process to replace checks not received by the participating employee.*

GT has a standard policy for re-issuing checks. The company makes efforts to pay everyone electronically either by direct deposit or by issuing a check card. Please see Attachment M – 6-23 Check Distribution Policy.

5. *The vendor shall establish a protocol and procedure to address un-cashed checks in compliance with statutory requirements and procedures established by the State Treasurer.*

GT will develop a policy and procedure to handle unclaimed property per Vermont Office of the State Treasurer regulations.

6. *Have a process to regularly de-activate inactive participants, employers, and employees from the payroll system.*

GT Independence has appropriate policies, procedures and internal controls for revoking IRS and State of Vermont forms when the service arrangement terminates. Please see Attachment N – 6-18 Consumer Termination

GT Independence also has policies and procedures to handle employee terminations and regularly communicates with participant's regarding employees who have not submitted timesheets to ensure records are up-to-date.

GT's operations group along with members of our quality and compliance team regularly monitor termination of employers and employees. Performing terminations timely is important for several reasons:

- Improves accuracy of monthly administrative fee submission
- Prevents potential tax liability issues associated with filing requirements
- Removes administrative costs for program stakeholders
- Prevents improper communications with stakeholders who have left the program.

7. *Make payments for goods, services and in cash when requested by a participating employer and as allowed under state policies and procedures and program guidelines.*

GT will submit payments for goods and services and in cash per State policy. GT will never issue cash payments to participants unless the reimbursement is

properly documented by the participant under applicable guidelines. Reimbursements can be processed along with regular payroll payments.

8. *Have a process that addresses employee wage changes in a timely manner.*

GT utilizes a wage change form that appends to the established employment agreement. The program specific business rules ensure that the appropriate procedure for providing raises is followed and within the participant's budget.

See Attachment O - Wage Change Form.

9. *Follow the terms of the CBA between the State of Vermont and AFSCME. Please note: "Employees" as defined in this RFP are referred to as "Providers" in the CBA.*
http://humanresources.vermont.gov/sites/humanresources/files/documents/Labor_Relations_Policy_EEO/Labor_Relations/DHR-Non-Management_Contract_16_18.pdf

GT will incorporate the CBA in development of program business rules, policies and procedures.

10. *Comply with the Department of Labor "Home Care" Rule. This includes but is not limited to having a process to ensure employees are paid overtime in accordance with the Department of Labor (DOL) rules and State program standards for granting exceptions to allow overtime.*
<https://www.dol.gov/whd/homecare/agencies.htm>

GT has in-depth knowledge of the DOL home care rule. GT has published guidelines for programs on staying in compliance and advises programs from time to time about how program policies impact FLSA compliance. GT will operate in compliance with the home care rule and stay up-to-date on changing rules and policies related to in-home care.

11. *Have a process to ensure employee sick leave accrual and use is tracked and implemented in accordance with the Vermont Earned Sick Time Rules issued by the Commissioner of Labor.* <http://labor.vermont.gov/wordpress/wp-content/uploads/Earned-Sick-Time-Rules.pdf>

GT will incorporate the Earned Sick Time Rules in its program policies and procedures. Accrual of one hour for every 52 hours worked is accounted for on each employee-employer relationship with the potential for employer's to cap accrual to 40 hours over a 12-month period.

N. Tax Related Services: The vendor shall provide the following tax-related services including:

1. *Preparation and mailing of W-2 forms and annual tax reports as required by the IRS and the State of Vermont, including W-5 forms;*

GT Independence ensures it follows all laws and regulations in regards to paying taxes on behalf of the employers and their employees in a timely manner. GT will ensure all W-2 forms and annual tax reports are submitted in a timely manner to the IRS and to the State of Vermont.

The W-5 form has been discontinued because the Advanced Earned Income Credit was repealed in 2010. GT Independence will ensure that the required notice to employees about the Earned Income Tax Credit is provided.

See Attachment P - 6-32 Preparing Year End Tax Documentation

See Attachment I - 6-24 Processing Tax Filings

2. *Completion of IRS 941 deposits;*

GT will ensure that IRS 941 deposits are made accurately and timely with corresponding schedules, R and B. GT will pull payroll information from our accounting software. We will then create a report listing the details of what is populated the 941. The payroll information is populated on the Schedule R, which lists payroll and withholdings by participant FEIN. A Schedule B is also populated from our accounting software to match our Payroll Tax Summary Report.

See Attachment I - 6-24 Processing Tax Filings

3. *Payment of workers' compensation insurance policy premiums. The State carries a single workers' compensation policy for all employees managed by the FE/A so the FE/A will not be expected to manage multiple individual policies;*

GT will maintain a single workers' compensation policy for all of the employees located in Vermont, which it will manage. This is similar to the policy it obtains in the state of Wisconsin.

Attachment Q - 6-42 Workers' Compensation Policies and Claims

4. *Payment of any other employment-related federal and state taxes;*

GT will ensure that all employment-related federal and state taxes are paid on behalf of the employer. GT will specifically create policies to ensure that State taxes in Vermont are filed appropriately.

See Attachment I - 6-24 Processing Tax Filings

5. *Completion of any other payroll-related reports or forms;*

GT will ensure that all payroll-related reports and forms are completed as are required.

See Attachment I - 6-24 Processing Tax Filings

6. *Preparation and mailing of IRS 1099 forms for independent vendors;*

GT maintains a file for each Independent contractor containing the form W-9 and payment information. This information is then used to complete and file 1099 forms for any independent contractors paid in that year by January 31st of the following year.

See Attachment R - 6-39 Hiring and Paying Independent Contractors

7. *Payment of actual unemployment claim costs, as forwarded to the vendor by the Vermont Department of Labor (VT DOL). Employees served by the FE/A are State employees for purposes of unemployment insurance only. Thus, the FE/A will not need to file multiple sets of unemployment premiums. The FE/A will be expected to file unemployment forms by program;*

GT will pay all unemployment claim costs submitted by the Vermont Department of Labor. GT understands that the employees are considered State employees for purposes of unemployment only and will pay all premiums in this regard.

8. *Participation in the annual Worker's Compensation Audit with the current policy carrier;*

GT will participate with the Worker's Compensation Auditor with the current policy carrier and currently does so on a regular basis.

9. *Refund to employees and to the State any FICA payments withheld for those employees for whom FICA withholding is not required.*

GT will ensure that FICA refunds are made to employees who earned \$2,000 or greater and any employer FICA refunds it receives will be forwarded to the State.

See Attachment S - 6-27 FICA Refunds – Vermont

- O. Providing Information:** *In the capacity of an F/EA, the vendor shall communicate effectively and in a timely manner with relevant parties including participants, employers, and employees who have a wide variety of disabilities, cultural differences, and individuals with limited English proficiency. Written materials shall be provided in plain English at a 6th grade reading level and available in alternative formats (e.g. large print, compatible with telecommunication devices for the hearing and speech impaired, languages other than English).*

Cultural Sensitivity

GT invests in diversity in the workplace. We have established a cultural competency committee to promote diversity and inclusion within the workplace. GT provides cultural competency training to each new employee at the company. The cultural competency committee meets regularly to discuss issues of diversity and inclusion at the company. The committee regularly searches for updates to our curriculum and posts interesting information on diversity and inclusion on company bulletin boards.

GT understands the importance of communicating with all parties. GT will ensure its employees perform cultural competency training and limited English proficiency training upon hire and annually thereafter. GT will ensure that all materials provided will be in plain English at 6th grade reading levels. If alternative formats are needed or requested then GT will ensure that they are provided to meet any needs of the Participants.

See Attachment T - 4-21 Mandatory Training, Attachment U 2-11 Communication Accommodations, and Attachment V – 1-03 Ethical Standards

In addition, the vendor shall:

- 1. Develop, implement, and maintain orientation and 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. The training shall be updated annually and/or as requested by the State.*

GT believes stakeholders who receive effective training provided by a qualified expert do best in their self-direction role. The training should include their role as an employer, program rules, and techniques for successfully managing their workers. Appropriate support must be provided to ensure an individualized approach to training based on cultural diversity and learning style. GT Independence supports brokers ensure the participant and or their designated representative understand the materials presented and have an opportunity to

ask questions. The implementation team will develop training materials that cover the role of the employer, program rules and techniques for successfully managing a self-directed arrangement. GT delivers training in multiple formats including printed materials, face-to-face discussion and phone support. All training materials can be downloaded through the individual's GT portal account.

Training Participants and Representatives

GT Independence will put together a training program for participants and representatives that is designed to:

- Prepare them to manage the administrative requirements of being an employer
- Help them develop necessary management skills to be successful in the arrangement
- Teach them specific requirements of their program

The training program will include instruction on

- Completing enrollment documents
- Roles in self-directed arrangements
- Managing funds, scheduling employees
- Getting support from the supports broker and GT's customer service department
- Employer liabilities (taxes, worker's compensation)
- Legal compliance issues
- Recruiting and training employees
- Disciplining employees
- Ensuring that services delivered meet plan goals

Training will be delivered through written materials. Each employer/participant will have an opportunity to participate in an orientation meeting in their home or preferred place. Workers, and any other stakeholder that the participant wishes to have present may attend the meeting to hear discussion and ask questions about training topics.

In-Services for Program Staff

GT Independence team members provide a variety of training to the various stakeholders in self-directed programs. Supports brokers are equipped to provide effective training that develops competency in the subject matter. Training for program staff (State/MCO care coordination teams and administrators) is designed to collaboratively address program elements and keep everyone up to date as program requirements change.

Training Workers

GT Independence supports brokers will train workers. Workers will receive training on their responsibilities per the enrollment documents. Workers will receive training on completion of program forms, particularly preparing and submitting service documentation for payment.

GT will also provide or provide access to other required trainings like critical incident reporting, first aid and CPR.

GT will NOT train workers on performance of their job duties.

Workers who attend the participant orientation meeting will receive their training in person. Workers who are hired after the initial enrollment will receive training under the participant/representative's direction with support from GT's customer service team.

2. *Have the ability to provide translation and interpreter services (e.g. American Sign Language and services for persons with Limited English Proficiency).*

GT Independence is committed to non-discrimination in the delivery of its services and in its employment practices. The company has policies that address cultural competency and Limited English Proficiency. GT conducts regular training, delivers non-discrimination information in its Employee Handbook, and posts non-discrimination notices including "I speak" cards in conspicuous places and conducts regular committee meetings to ensure compliance with applicable Human Rights Laws.

GT Independence regularly provides assistance to people with Limited English Proficiency. Multiple bilingual customer service associates are available to field calls. The company has access to translation services for on the spot translation or to draft materials in a different language. GT also makes information available in Braille and large print. GT assists participants in other ways to assure that they are receiving service that is sensitive to their cultural values, beliefs and practices.

GT will maintain a service to perform translation and interpreter services to meet any needs. This service will provide support on a variety of languages with the ability to add additional languages as needed. Attachment U 2-11 Communication Accommodations, Attachment W - 1-10 Cultural Competence and Limited English Proficiency, and Attachment V – 1-03 Ethical Standards

3. *Ensure that employers are provided with information periodically provided by the State by inserting stuffers in pay or report envelopes, posting notices on the vendor's website and by other electronic means of notification.*

GT will ensure that employers are notified as necessary regarding information provided by the state through mailings, postings on our website, and via our online portal. GT will designate a liaison to interface with the various programs on communications and to get written communications approved.

P. Claims and Reimbursement: *The vendor shall enroll and maintain status as a Medicaid provider to process claims. Further, the vendor shall:*

1. *Have a process, agreed upon with the State, to verify and ensure Medicaid eligibility before submitting Medicaid claims for any participants.*

GT will develop a policy and procedure for determining Medicaid eligibility prior to submitting claims. GT has the capacity to interface with web based eligibility systems, to submit HIPAA compliant eligibility inquiries or to use other systems that may be in place. Participant eligibility is recorded in the Datatrac system and payments cannot be made on behalf of participants who are ineligible.

2. *Submit claims for reimbursement within required timelines.*

GT will develop a billing schedule for the program. The schedule will be optimized to align with Vermont check writing schedules to ensure maximum efficiency in recovering outstanding receivables. GT has developed internal controls to monitor the timeliness of claims submission. GT's billing manager has responsibility for ensuring billing timelines are met.

3. *Work to resolve denied claims in the following manner. In the event of a denied claim, the vendor shall contact all involved parties within one business day. The vendor shall follow-up regarding denied claims at least weekly and until resolved. Claims denied due to timely filing issues become the responsibility of the vendor unless the vendor can prove otherwise.*

GT will develop requirements for application of remittance data. Upon receipt of remittance data, GT will take steps to" (1) apply payments in the GT claims module, (2) identify unpaid claims, (3) determine the cause of the unpaid claim (claim was not processed, claim was denied, claim was submitted in error), (4) contact the appropriate parties to resolve any denied claims.

4. *Send claims to different funding sources dependent upon the participant's program. These may include, Vermont Medicaid, DA/SSA/SISO, or directly to the State.*

During the billing setup process, GT will identify the appropriate payer for claims under the different Vermont programs and submit claims accordingly. GT is prepared to handle different claims submission timelines and formats across the various programs.

Q. Cash Flow:

GT Independence has significant experience in working with State Agencies to ensure services are available to all eligible members statewide. GT has adequate personnel and financial resources to offer fiscal intermediary services to all eligible Participants in the State of Vermont.

GT Independence actively manages financial performance to ensure that the company is adequately capitalized to sustain growth and investment. Through the company's 13 year history, the executive team has managed growth that ranges from 25-40% annually. GT Independence has adequate cash flow to cover expected program growth in the State of Vermont.

The executive team employs a range of financial management tactics to ensure responsible fiscal management of program funds and maintain cash flow sufficient to pay all program payments on time.

See Attachment X – Audited Financial Statements, and Attachment Y – Key Bank Reference

R. Employer and Employee Enrollment:

Soon after contracting and before most of the transition process is complete, GT will develop enrollment packets for Employers and Employees specific to each program in the State of Vermont. GT will review the content of current packets and determine which items need to be changed based on the change in F/EA providers. Once the packet contents are defined, the GT implementation team will:

- Draft packet documents that meet all contract requirements including Employer Handbook and instructions on filling out required documentation
- Submit drafted packet to the State for approval
- Integrate approved documents into an electronic fillable form
- Integrate packets into GT's e-enrollment system which allows complete enrollment through a mobile device

- Integrate packets into GT's document management system which allows automated processing of enrollment data into the GT information system

Traditionally GT Independence distributes Employer and Employee enrollment packages through our supports broker team during an in person enrollment meeting. The Supports Brokers is able to provide in-person instruction on form completion and deliver the Employer Handbook with customized training by program.

Upon contract award, GT Independence will collaborate with State personnel to define the optimal method for distributing enrollment packets for each program in Vermont.

S. Unemployment and Workers' Compensation: *The vendor shall follow the procedures established to ensure coverage of eligible individuals under the group Workers' Compensation Insurance policy secured by the State. Additionally, the vendor shall:*

1. *Establish a separate account with the VT DOL for each of the employee groups represented by the respective programs.*

GT will set up unemployment insurance accounts with the VT DOL. There will be one account for each program's employee group.

2. *File any reports relating to health insurance coverage which are or will become required, even though employees employed by participants are not considered employees of the State for purposes of health insurance coverage.*

GT complies with mandatory health care regulations, including those regulations and required reports arising from the Affordable Care Act.

3. *Serve as the employer's representative with VT DOL when claims related to the vendor's functions are filed and shall cooperate with the VT DOL in accordance with State procedures.*

GT will execute Form C-50 Vermont Department of Labor Limited Power of Attorney and Tax Information Authorization to serve as the Employer's agent. GT regularly serves as the employer's representative regarding unemployment claims and has policies and procedures to do so. GT will setup a Vermont-specific policy and procedure for responding to unemployment claims per program guidelines.

T. Training and Communication:

GT Independence will require, and make available, all personnel assigned to service of programs in the State of Vermont to attend State training sessions as requested by the State.

U. Vermont Presence:

GT Independence confirms that upon contract award it will establish a physical presence in the State of Vermont which meets the requirements listed in the RFP. GT will staff personnel in Vermont to be available for face-to-face meetings with the State on at least a monthly basis. The GT personnel located in Vermont will have the authority to make decisions regarding operations of GT's services.

Please see Section A, Item C for additional information on GT Independence's Vermont Presence.

V. Other Duties: *In addition to the above, the vendor shall:*

1. *Provide reports to the State including financial statements and other reports to assist the State in monitoring the programs serviced by the vendor.*

GT will provide ongoing budget reports indicating the status of participants' usage against the authorization/budget both via mail and our online portal. These reports are provided both to participants and to the case managers for review. GT's system is dynamic in its ability to provide a number of reports to meet the State's needs for monitoring GT's services.

See Attachment Z - 6-20 Monthly Consumer Reports

2. *Report any suspected abuse, neglect or exploitation of a vulnerable adult in accordance with Vermont Statutes Annotated Title 33, Chapter 69. <http://legislature.vermont.gov/statutes/fullchapter/33/069>.*

GT takes abuse, neglect, and exploitation seriously. All of our employees undergo annual training on identifying and reporting any occurrences of abuse, neglect, or exploitation. We have developed a thorough incident reporting process to document and investigate any possible occurrence and report them as necessary.

See Attachment AA - 3-21 Incident Reporting

3. *Report any suspected abuse or neglect of a child to the State according to Vermont Statutes Annotated, Title 33, Chapter 49. <http://legislature.vermont.gov/statutes/fullchapter/33/049>.*

Similarly, GT will ensure that it follows its policies and procedures in reporting any suspected child abuse or neglect to the State according to applicable laws. See Attachment AA - 3-21 Incident Reporting

4. *Report suspected fraud within two business days to the State via the contacts identified by the State. <http://ovha.vermont.gov/>*

GT has developed a diligent process to address fraud through our fraud prevention program as outlined in our Policies and Procedures Manual. Our staff completes incident reports, which are investigated, whenever fraud is suspected. These reports will be shared with the State within 2 business days.

We also take a number of measures to prevent fraud. Our trained payroll processors perform a number of processes, including but not limited to, reviewing timesheets for any noticeable alterations such as white out or markings. A prevention of fraud letter is provided to every participant upon enrollment to alert them of fraud and its consequences. Supports Brokers train new Employers and Employees to ensure awareness of fraud, waste, and abuse. Our quality improvement team actively reviews fraud trends and incorporates processes to prevent it and mitigate its impact.

See Attachment AA - 3-21 Incident Reporting
See Attachment BB - 1-13 Fraud Prevention Program

5. *Securely maintain all timesheets, billing records, background check records and payroll records as required by law. All documents and records must be made available to the State and any of its agents, including state auditors, for review and auditing, upon request.*

GT maintains all documents securely on our servers for 10 years. Our document management system ensures that these files are categorized and easily accessible in the case of an audit. GT will cooperate with any state agents in the auditing of documentation.

See Attachment CC - 2-01 Privacy and Security Controls and Attachment DD – 2-10 Document Retention and Disposal

6. *Have a method for receiving, responding to, and tracking complaints and shall provide the State with complaint and complaint resolution information on a regular basis as agreed upon by the vendor and the State.*

GT uses a proprietary call logging system to track all incoming calls with information on whether or not the call is a compliant, details of the call or issue,

and resolution tracking. All calls are tracked to ensure that requests are handled and our Customer Service Associates are incentivized based on the use of metrics to resolve all items in a timely manner. Any open requests are reviewed daily and outstanding items are addressed. Call logs are reviewed by Customer Service Team Leaders and Managers weekly to identify issues and procedure inefficiencies. Ongoing or trending issues are addressed and communicated to the Quality Improvement department for further investigation. GT can and will produce reports from this call logging software on a regular basis.

See Attachment EE - 6-22 Tracking Communication and Complaints

7. *Establish a procedure to ensure that participants who live out of state will continue to receive the vendor's services when approved by the State.*

GT has established procedures to ensure that all participants who live out of the State continue to receive our services when approved. GT serves individuals currently in other programs who cross State lines. GT Independence ensures that appropriate Employer tax forms are executed and filed based on State requirements and applicable reciprocity rules. We will always ensure the State is kept informed on such matters.

8. *Be required to notify the VT DOL of any newly hired persons, in the manner determined by VT DOL, in accordance with the requirements set forth by the State under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996.*

GT will utilize the Vermont Department of Labor's online new hire reporting system to report the required information including:

- Employer's Name, Address, and Federal Employer Identification Number (FEIN)
- Worker's Name, Address, Social Security Number and first date of employment.

9. *Periodically produce reports, as requested by the State, as to services it provides. The vendor shall have a secure database which facilitates comprehensive reporting of information about program participants, employers and employees.*

GT's proprietary systems allow customized data reporting and control functions. GT has developed a web based time tracking application which automatically uploads data into our system. This system is robust in its ability to monitor incoming data, track participant status, and track other participant

related information. The State will be able to access the web portal to obtain participant information. We will plan to leverage our system to meet the monitoring and service needs of Vermont. Our system will import authorizations, track payments, track utilization of participant services against authorizations, report on the status of the participants' utilization against the authorization, and identify any issues such as overutilization or overtime.

10. Have a functional disaster recovery plan in place for restoring software and master files and hardware backup in the event management information systems are disabled to ensure the payroll and payment systems remain intact. Penetration testing shall be performed on this system annually. Results of testing are to be submitted to the State for review. The Disaster Recovery Plan reviewed and revised as needed annually. Vendor shall provide the State a copy of their Disaster Recovery Plan and provide updated versions as they occur.

In the event of a disaster GT has multiple systems in place to have payroll and supporting services available. GT's headquarters and datacenter have redundant power provided from batteries and a natural gas generator. Using cloud integration, our customer service lines and other communication systems are available from anywhere. GT currently replicates servers to an alternate facility in Sturgis, Michigan. The standby datacenter receives replicated data and servers throughout the day. Additionally, we use multiple methods to backup and test sensitive data and applications on regularly scheduled intervals. Our Disaster Recovery Plan includes penetration testing and our most recent test was completed on February 24th, 2017.

See Attachment FF - IT Disaster Recovery Plan

GT Independence performs services through multiple facilities in Sturgis, Michigan as well as offices in Raleigh, North Carolina and Milwaukee, Wisconsin. Our cloud based data systems, data backup and restore procedures, and multiple office locations ensure continuity of services for Participants, Employers and Employees in the event of any disaster.

GT Independence employs support broker staff in each State that we serve. GT Independence has the ability to temporarily transfer support brokers among the areas of operation in the event that additional support broker resources are needed, or in the event of a disaster, to ensure adequate services are provided.

GT Technology staff regularly perform tests on file servers and backup data to ensure the accuracy of backup data and to test the disaster recovery preparedness response to a potential data event. Systems are maintained in

order to be able to return to full operations within 24 hours in the event of a data emergency. This recovery time is possible through our redundant hardware hosts for the virtual environment along with High Availability configurations, off site backups and redundant replications of servers.

W. Evaluation and Performance Measures:

GT uses metrics and performance standards throughout the organization to manage service levels and communicate performance expectations to team members. The company has a quality management team that reviews performance and makes the annual quality improvement plan. The quality management team will be responsible for internal auditing related to the performance management plan and for implementing changes to business practices to improve performance on the plan.

See the table below for GT's proposed performance management methodology:

Performance Area	Standard	Measurement Methodology	Frequency of Submission
Accuracy and timeliness of billing	Billing Reconciliation Completed and Claims Submitted within 5 business days of scheduled pay day.	Compare payroll journal report to billing reconciliation report. Verify invoice date in GT's system. Submit billing summary.	Quarterly
Success in providing assistance and education for new and ongoing participants and employers	In-home orientation completed for 95% of new participants/employees within 20 days of referral; New hire onboarding completed within 14 days of submission of new hire packet.	Complete participant and employee enrollment checklists. Produce summary report.	Monthly
Success in working with individuals with Limited English Proficiency	100% of requests for communication accommodation are	Record accommodation requests and note	Annually

	resolved within 24 hours.	resolution. Submit data.	
Meet Expectations of Stakeholder Groups	Receive 90% or greater satisfaction rating on annual surveys.	Conduct annual, participant, employee and Agency surveys. Submit results.	Annually
Success in identifying billing/payroll errors and fraud.	98% of audited service documentation reflects proper handling of potential issues	GT's quality management team audits a sample of service documentation and submits results.	Quarterly
Cost/Reimbursement Strategy	Company shall effectively manage costs for the program.	GT CEO confirms that cost management practices have been effective.	Annually

Reporting Requirements



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Reporting Requirements

GT Independence utilizes a state-of-the art proprietary software system that is hosted on an SQL server allowing easily built customized reports to help better serve our stakeholders. A detailed description of the software system and its capabilities can be found under Section Qualifications, D.1 of this proposal.

Utilization Management Reports

GT Independence produces aggregate Utilization Management Reports on an ad hoc basis when requested. Reports are fully customizable with adjustable parameters to provide the desired data. These parameters include unit type (dollars/units), frequency (total authorization, authorization-to-date, monthly, weekly), and tolerance level (over or under by a percentage or set amount).

See an example provided below that is using the following parameters:

Unit type: Units

Frequency: Monthly (5/1/17-5/31/17)

Tolerance: 0%

Variance Report

Reporting Period: from 05/01/2017 to 05/31/2017

ClientID	Client	BudgetID	AuthID	CostCategory	Used	Allowed	Diff
196183	[REDACTED]	300327	300327	T1019 CG	96.00	113.00	17.00
		300327	300327	S5130 CG	96.00	113.00	17.00
196930	[REDACTED]	294987	294987	T1019 CG	0.00	114.00	114.00
		294987	294987	S5130 CG	0.00	81.00	81.00
197282	[REDACTED]	291614	291614	S5130 CG	96.00	114.00	18.00
		291614	291614	T1019 CG	192.00	228.00	36.00
197472	[REDACTED]	287615	287615	S5130 CG	216.00	250.00	34.00
		287615	287615	T1019 CG	216.00	250.00	34.00

The report calculates an “Allowed” amount compared to what has been “Used” and shows any difference.

Part of GT Independence’s payroll process includes the review of a Variance Report prior to any payment being issued.

Budget Reports

Participants receive a report showing them their authorized amount and used amount. Reports are available online through participant’s individual portal account and are also

sent via US Mail. A copy of these reports are provided to State of Vermont Case Management teams through the GT Independence Agency Portal. A Monthly Statement Guide as well as our friendly Customer Service team help Participants understand their Monthly Report. One sample is shown below.

Management Reporting

Below are a few examples of our reports used on a regular basis to monitor things such as authorizations needed, employee eligibility, flagged accounts, adds and drops, and last pay dates.

Authorizations Near Expiration

within 60days of Enter Date
as of June 16, 2017

Agency	Name	Client Status	County	Case Manager Name	latest Authd	BudgetLatest Start Date	BudgetLatest End Date	Service Name	Units	Rate	Total
Humana Florida 01		Active	Escambia		297115	5/1/2017	7/31/2017	S5135 CG-Adult Companion Care	672	\$3.36	\$2,257.92
Humana Florida 01		Active	Escambia		294011	1/26/2017	4/2/2017	S5130 CG - Homemaker Services	280	\$3.36	\$940.80
Humana Florida 01		Active	Escambia		294011	1/26/2017	4/2/2017	S5135 CG-Adult Companion Care	1408	\$3.36	\$4,730.88
Humana Florida 01		Active	Escambia		250968	6/7/2016	6/6/2017	S5130 CG - Homemaker Services	1440	\$2.81	\$4,046.40
Humana Florida 01		Active	Escambia		297559	5/1/2017	7/31/2017	S5135 CG-Adult Companion Care	276	\$3.36	\$927.36

Employee Eligibility as of June 16, 2017

Client ID	Assign Start Date	Client Name	Assignment ID	Emp Name	Last Pay Date	Employee Eligibility Item	Date Completion	Date Expiration	Days To Expiry
185403	3/1/2014		311214		4/28/2017	Criminal Record Check	11/10/2015	11/10/2020	>90 Days - Good
185403	3/22/2016		337128		2/17/2017	Criminal Record Check	03/22/2016	03/22/2021	>90 Days - Good
185455	10/21/2016		347501		6/9/2017	Criminal Record Check	10/17/2016	10/17/2021	>90 Days - Good
185952	5/24/2017		312187		4/1/2015	Criminal Record Check	05/25/2017	05/25/2022	>90 Days - Good
185952	8/12/2016		343614		6/9/2017	Criminal Record Check	08/08/2016	08/08/2021	>90 Days - Good
186278	6/8/2015		323452		5/26/2017	Criminal Record Check	06/15/2015	06/15/2020	>90 Days - Good

DNP Flags for Clients and Employees

Origin	Client ID	Client Name	Employee ID	Employee Name	DNP type	Reason	DNP Description	DNP Start Date	DNP End Date
FL	203217				Client Deceased	email from cm-Hi. Mrs. Annie Sloan has expired as of 3/7/2017. Thank you		3/8/2017	
FL	195913				Client Disenrolled	Rcvd auths to terminate services eff date 8/18/16 as member has chosen another provider	Participant renewed services effective 2/22/17.	8/19/2016	2/22/2017
FL	194782				Client Hospitalized	Notified by AEC on 1/18/16 to suspend services effective 11/24/2015 due to member being admitted to acute care	Member returned home 1/14/16	11/25/2015	1/14/2016
FL	194386				Client Hospitalized	Rcvd notification form AEC on 5/21/16 to suspend care plan eff date 5/12/16 as member was admitted to hospital	Rcvd auth to resume services eff 7/5/16	5/13/2016	7/1/2016
FL			296410		Notify Flag		awaiting AHCA results.	1/5/2017	1/23/2017

Drops and Adds from 01/01/2017 to 05/31/2017

Agency Name	Net Adds	Client ID	Last Name	First Name	MI	Client Status	Start Date (Adds)	Term Date (Drops)	Term Reason	Support Coordinator
		186209				Inactive	3/7/2017	3/7/2017	Participant Eligibility	Nikia Glenn
		190299				Active	1/30/2017			Donna T Stephens
		191321				Active	3/29/2017			Valerie Liddy
		194446				Inactive		1/3/2017	Participant Eligibility	Posie Elliott
		195913				Active	2/23/2017			Diana C Sandoval
		198316				Deceased		1/21/2017	Deceased	Donna T Stephens
		200615				Active	2/8/2017			Barbara Fountain

Last CheckDate by Client

6/16/2017 4:16:54 PM

Agency Name	Client ID	Client Last Name	Client First Name	Last Check Date	Client Status	Start Date	Term Date
	200891			6/9/2017	Active	10/14/2016	
	198613			6/9/2017	Active	7/19/2016	
	204784				Active	6/2/2017	
	197283			4/28/2017	Active	10/24/2016	
	201175			6/9/2017	Active	10/28/2016	

Active Employees Last Payment Date as of June 16, 2017

AgencyName	EMP Last Name	EMP First Name	Assignment ID	EOR LastName	EOR FirstName	Last Pay
			338831			06/09/2017
			340160			06/09/2017
			340557			06/09/2017
			341674			06/09/2017
			341807			05/26/2017

GT Independence has the ability to provide robust reports to the State to meet their specific reporting requirements. Upon contract award GT Independence will collaborate with State personnel to define the format, data, and delivery schedule of reports to be provided to the State.

Certificate of Compliance



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Certificate of Compliance

GT Independence has completed the Certificate of Compliance.

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
N/A		

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.

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:

-
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? _____
 - 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:

-
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: _____

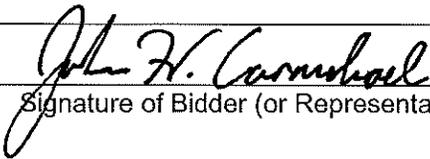
Addendum No.: _____ Dated: _____

Bidder Name: Guardiantrac, LLC d/b/a GT Independence Contact Name: John Carmichael

Address: 215 Broadus St. Fax Number: 269-651-4501

Sturgis, MI 49091 Telephone: 269-651-4500

E-Mail: jcarmichael@gtindependence.com

By:  Name: John Carmichael
Signature of Bidder (or Representative) (Type or Print)

END OF CERTIFICATE OF COMPLIANCE

Price Quotation



www.gtindependence.com

Price Quotation / Proposed Reimbursement

GT Independence proposes a per member per month (PMPM) fee of \$95.00 for each Consumer and an enrollment/startup fee of \$100.00 per member. The price is the same regardless of the number of employees/contractors hired by the individual served.

In accordance with national standard practice for F/EA services, GT Independence bills only the PMPM listed above and does not submit line item expenses to the State of Vermont. For a complete breakout of general operating expenses and costs please see Attachment Y- Audited Financial Statements.

The per member per month fee will be charged each month for any Consumer who is active in our system for at least one day in a month.

Electronic Visit Verification (EVV)

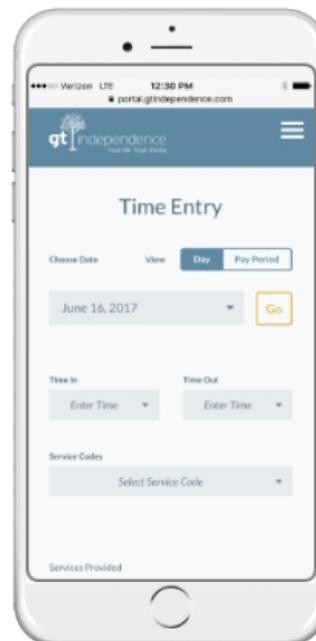


www.gtindependence.com

Electronic Visit Verification

Since 2015, GT offers leading edge online services through its web portal including web-based time keeping. Currently, over 1,000 of GT's active participants across multiple States and programs are utilizing our portal to submit their timesheets. GT regularly seeks feedback from portal users and develops enhancements to the web-based timekeeping system as needed. Customer Service Associates assist with registering and providing phone support to users who utilize the system.

The system has functionality that meets Electronic Visit Verification (EVV) requirements set forth in the 21st Century Cures Act. GT Independence has developed a significant depth of understanding in the various features and implementation challenges presented in EVV systems.



Description of Timekeeping and EVV System Capabilities

GT's system meets EVV requirements:

- Electronically Verifies Date, Location, Provider Name, Time In/Out. Providers can punch in/out using a mobile device. The system captures GPS coordinates for the punch. Provider is authenticated through the GT Portal using three factor authentication.
- Electronically Verifies Service Codes and Captures Service Notes. GT's system allows providers to claim only authorized services. Workers enter tasks that are customized based on the service code and individual ISP. The system screens service entries to prevent overlapping service time, unauthorized services, exceeded service authorizations, ineligible participant and ineligible employee. The system can be customized to gather quality data for measuring key health indicators.
- Customized for Consumer Direction. GT made the system customizable to offer flexibility and control that participants in self-directed arrangements expect. For example, both participants and workers confirm the service data before submitting for payment. Also, traditional EVV systems are schedule-driven to accommodate the provider directed model. While GT's system has a scheduling feature, it is not a requirement. Participant employers have the option to create worker schedules, however, by default, workers punch in and out without a pre-set schedule and their time is approved by the Participant Employer.
- Offline Capabilities. Rather than relying on difficult telephonic systems when there is no mobile access in a home, GT's system employs a simple key generator

device to confirm place and time. The key generator can be used in conjunction with an offline device or a regular paper timesheet.

- **Exception Handling and Robust Reporting.** GT designed and built its EVV solution in collaboration with stakeholders. As the Employer, Participants are able to fix and approve shift errors such as forgetting to punch out. GT's flexible system is able to accommodate and customize the rules of exception handling by program. A series of robust reports allow appropriate oversight and monitoring capabilities including shifts that occur outside the home, number of exceptions by participant and worker for a given period, and current ongoing shifts in real-time.

Implementation Challenges and GT Accommodations

Our experience with implementation our web-based timekeeping solution has helped us to better identify roadblocks and solutions. New technology always faces an adoption curve. Often, elders and people with intellectual disabilities face significant roadblocks when trying to access internet based services. Online tools have the potential to create operational efficiency, but understanding the different administrative challenges is important in order to receive the benefit from technology. Below is a table summarizing some lessons learned:

Roadblock	Challenge	Accomodation
Adoption	Elders and disabled people tend to have difficulty accessing web based technology	Provide face-to-face guidance during the initial registration process.
		Make training materials available through multiple formats including video.
		Provide excellent phone support so that users don't become frustrated.
		Have an offline solution.
	Stakeholders Resist the Change from the Old System.	Adjust program rules to encourage adoption.
		Provide incentives for adopting the new system
Administration	Workers forget to clock in/clock out	GT Operations staff confirms shift begin/end

		times with participant and worker before pay day.
	The weekly schedule needs to be changed	System is configured not to require a weekly schedule. Participants have the freedom and authority as the employer to determine and approve worker schedules on their own.
	Worker's attempt to claim unauthorized services	System blocks unauthorized services. GT operations staff review and request updated authorization if necessary.
Financial	3 rd Party EVV Systems don't manage claims efficiently	GT billing staff tie out and make adjustments to 837 data, supplying a reconciliation summary with claims data when a 3 rd Party EVV System is utilized.