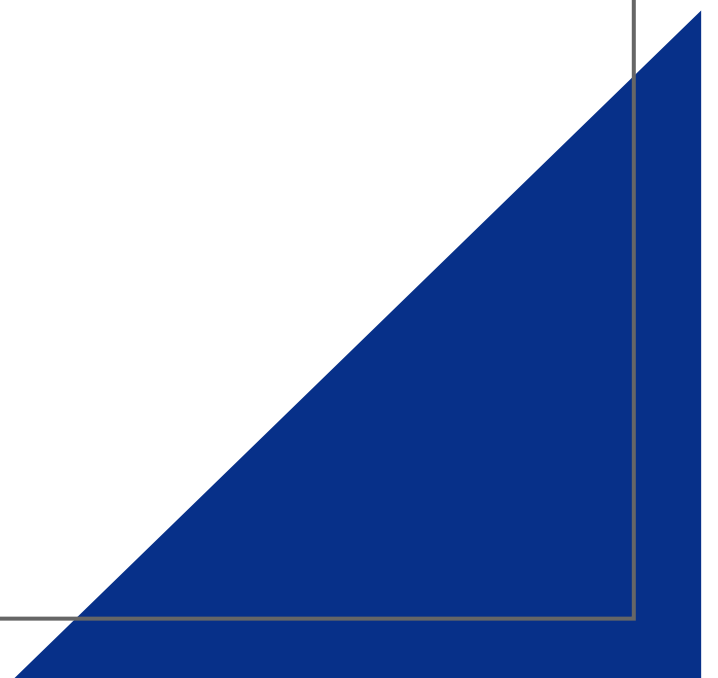


Conflict-Free Case Management



Belinda Hawks | Remi Romanowski-Pfeiffer

Context



Case Management Defined

42 CFR 440.169(d)(1)
42 CFR 440.169(d)(2)
42 CFR 440.169(d)(3)
42 CFR 440.169(d)(4)

Assessment

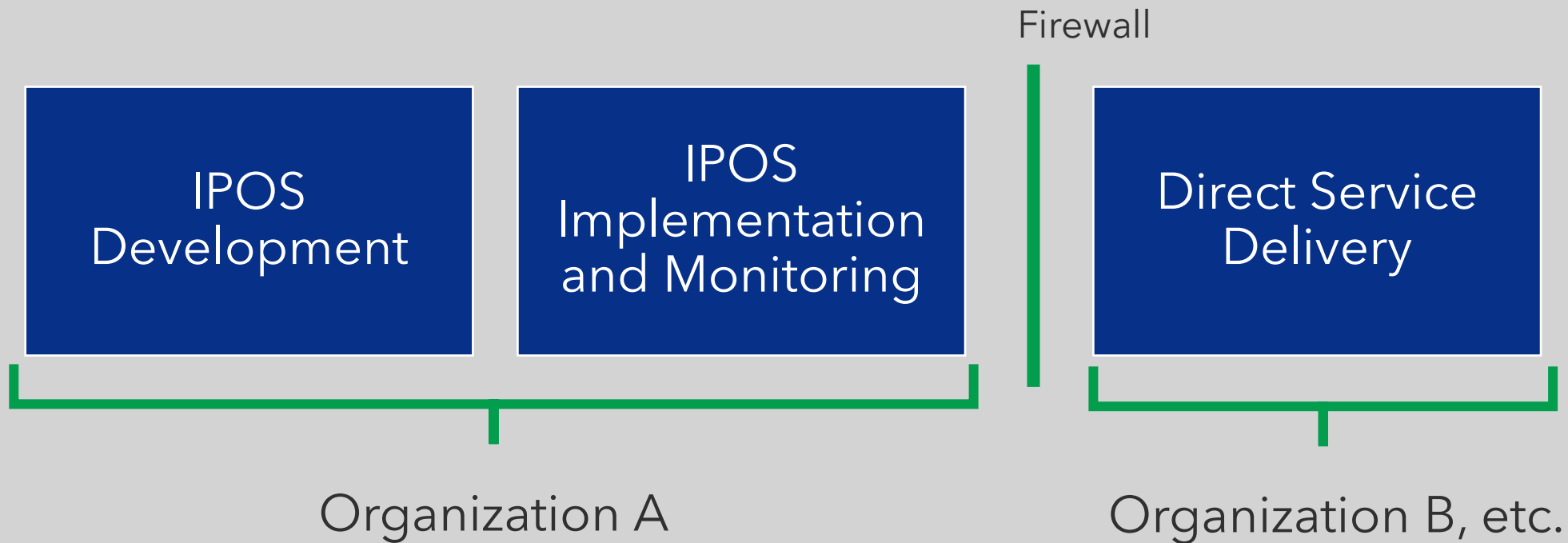
IPOS
Development

IPOS
Implementation
and Monitoring

Referral to
Services

Firewalls

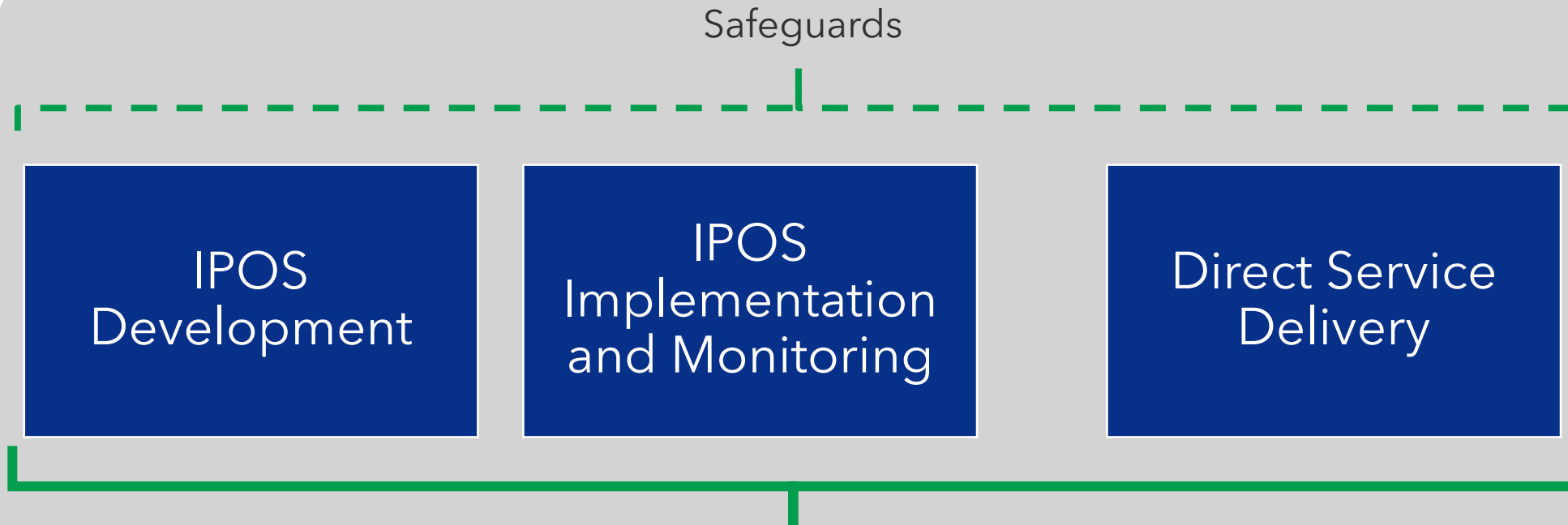
42 CFR 441.301(c)(1)(vi)



Difference in Financial Interest

Safeguard

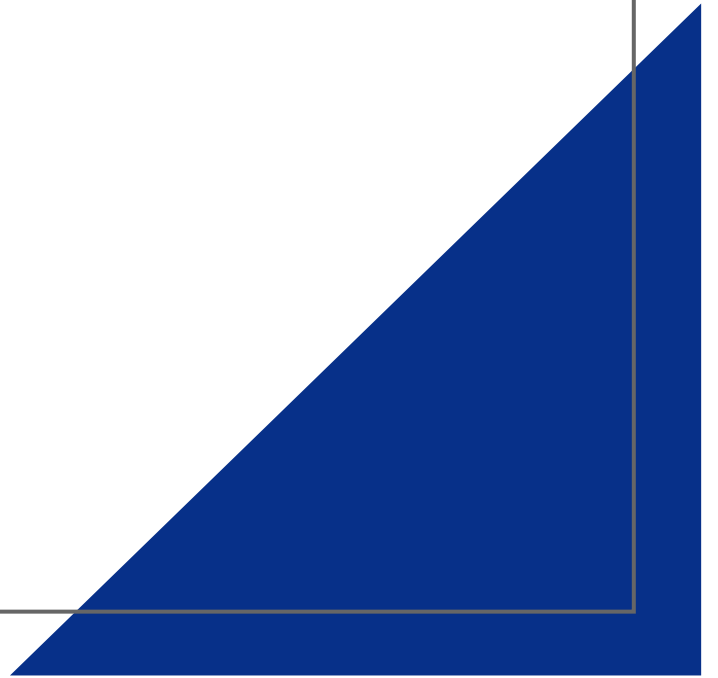
42 CFR 441.301(c)(1)(vi)



Organization A

Single Financial Interest

Waiver Approach



Michigan's 1915(c) Waiver Firewalls

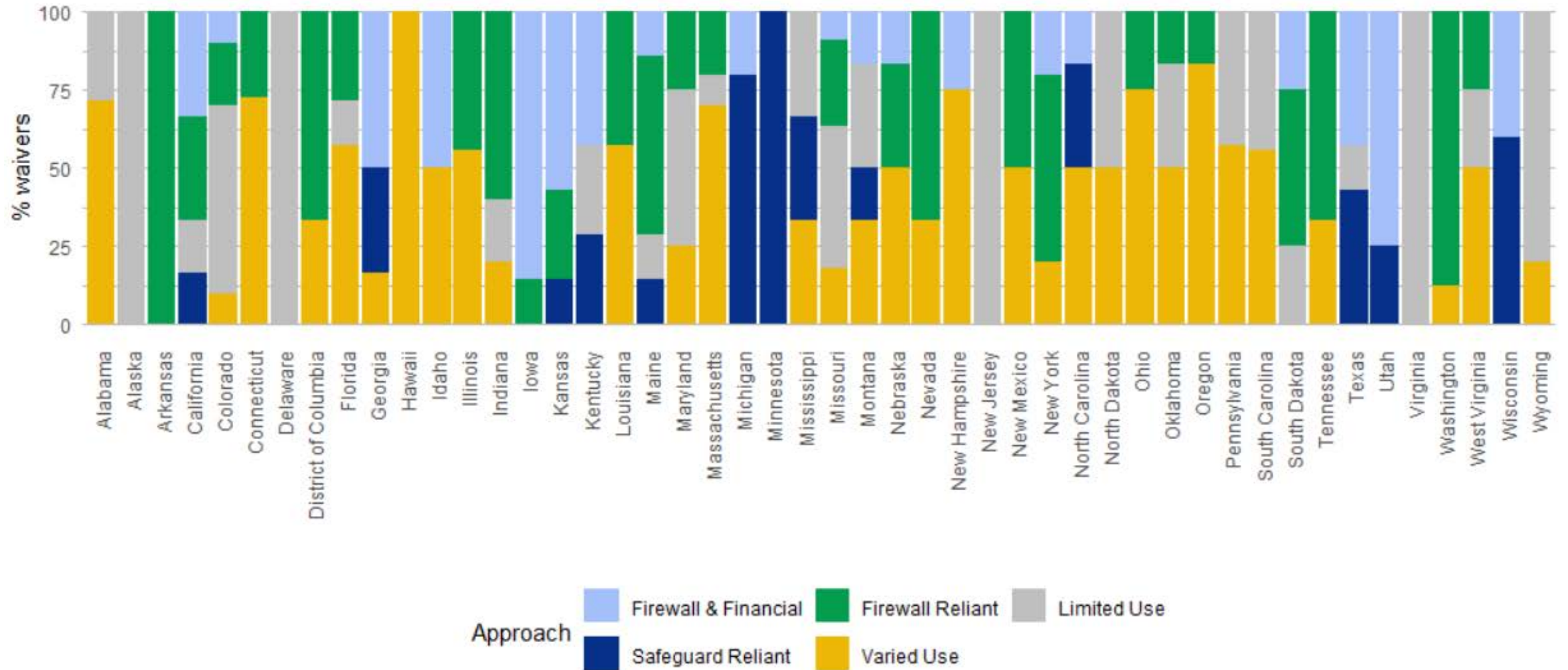
Waiver Name	Development Firewall	Implementation & Monitoring Firewall
MI Children's Waiver		
MI Choice		
MI Habilitation Supports Waiver		
MI Health Link HCBS		●
MI Waiver for Children w/ SED		

Michigan's 1915(c) Waiver Other Safeguards

Waiver Name	Self-Direction Option	Self-Direction Requirement	Advocacy	Financial Mgmt.	Supports Broker	Options Couns.	Indep. Facilitation
MI Children's Waiver	●		●	●	●	●	●
MI Choice	●		●	●	●	●	
MI Habilitation Supports Waiver	●		●	●	●		●
MI Health Link HCBS	●		●	●	●		
MI Waiver for Children w/ SED	●		●	●	●	●	●

Varied Approaches Within States

Which approaches* are waivers within each state using?



* As classified by clustering

Safeguard Implementation



IPOS Resource Survey

Independent
Facilitation

Independent
Advocates

Supports
Brokers

Case Managers
and Supports
Coordinators

Shared
Decision-
Making

Fiscal
Intermediary

IPOS Resource Survey

When do the CMHs use safeguards in the process?

Which CMHs report using safeguards?

What types of relationships do CMHs have with those providing safeguards?



Next Steps

Finalize National
Research

Summer of 2021

Complete Analysis of
MI Implementation

Late Summer of 2021

Complete Gap Analysis
and Action Plan

Fall of 2021