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READINESS REVIEW TO DELIVER VETERANS DIRECTED HOME AND COMMUNITY-BASED SERVICES

Purpose of the Review: 1) Determine whether essential participant-directed program components are in place; and 2) Identify areas where assistance may still be needed.

Participants of the Assessment: Primary agency or organization staff of State Unit on Aging and AAA staff providing VDHCBS. For the areas previously assessed (if any) please just respond when the answer has changed from the original assessment or previously incomplete or unknown.

Program Elements	Questions	Responses
<i>Program Overview</i>	<p>Where are you in the development/contracting/implementation of each of the following participant-directed program components :</p> <ul style="list-style-type: none"> • Intake and initial contact with new participants <ul style="list-style-type: none"> ○ Who will do this? ○ What tool(s) will be used? ○ What experience/ preparation have staff/contractors had for this in a participant-directed model? ○ Are there written materials for potential participants? How will you make them available in multiple language/accessible formats? ○ Is there a no-cost means for participants in your catchment area to reach you via phone? ○ Are performance standards developed for this task? ○ Who will monitor performance of these tasks? ○ How often will monitoring be done? ○ Would you like assistance in this area of program development? ○ Will data be collected on the number of contacts and the results of those contacts? 	

Program Elements	Questions	Responses
	<ul style="list-style-type: none"> • Conduct a participant assessment <ul style="list-style-type: none"> ○ Who will do this? ○ What assessment tool(s) will be used? ○ What experience/preparation have staff/contractors had for this in a participant-directed model? ○ Are performance standards developed for this task? ○ Who will monitor performance of these tasks? ○ How often will monitoring be done? ○ Would you like assistance in this area of program development? ○ Is the assessment process the same for this program as for other OAA programs? If no, how do they differ? ○ Does the assessment process include a section or questions to determine competency to self-direct? If no, how is this determined? ○ How is participant assessment information collected and retained? • Provide service planning assistance <ul style="list-style-type: none"> ○ Who will do this? ○ What tool(s) will be used? ○ What experience/preparation have staff/contractors had for this in a participant-directed model? ○ If doing VDHCBS, what preparation and resources will be available for younger veterans? ○ Are performance standards developed for this task? ○ Who will monitor performance of these tasks? ○ How often will monitoring be done? 	

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	<ul style="list-style-type: none"> ○ Would you like assistance in this area of program development? ○ Is the service planning process the same for other OAA programs? If no, how do they differ? ● Assist participants to decide for themselves, or with a participant representative, what mix of goods and services will best meet their, and their family caregiver’s care needs <ul style="list-style-type: none"> ○ Who will do this? ○ What tool(s) if any will be used? ○ What experience/preparation have staff/contractors had for this in a participant-directed model? ○ If doing VDHCBS, what preparation and resources will be available for younger veterans? ○ Are performance standards developed for this task? ○ Who will monitor performance of these tasks? ○ How often will monitoring be done? ○ Would you like assistance in this area of program development? ○ Is the focus to offer support to caregivers or program participants or both? ● Assist participants and/or their representative to manage a flexible, individual budget <ul style="list-style-type: none"> ○ Who will do this? ○ What tool(s) will be used? ○ What experience/preparation have staff/contractors had for this in a 	

Program Elements	Questions	Responses
	<p>participant-directed model?</p> <ul style="list-style-type: none"> ○ What is the approval and operational process for making changes? ○ How are budgets and changes transmitted to the FMS? ○ Are performance standards developed for this task? ○ Who will monitor performance of these tasks? ○ How often will monitoring be done? ○ Would you like assistance in this area of program development? <p>Assist participants and/or their representative to hire and supervise their own workers, including family or friends</p> <ul style="list-style-type: none"> ○ Who will do this? ○ What tool(s) will be used? ○ What experience/preparation have staff/contractors had for this in a participant-directed model? ○ Are performance standards developed for this task? ○ Who will monitor performance of these tasks? ○ How often will monitoring be done? ○ Would you like assistance in this area of program development? <ul style="list-style-type: none"> ● Assist participants and/or their representative to purchase items or services needed to live independently in the community <ul style="list-style-type: none"> ○ Who will do this? ○ What tool(s) will be used? ○ What experience/preparation have staff/contractors had for this in a 	

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	<p>participant-directed model?</p> <ul style="list-style-type: none"> ○ Are performance standards developed for this task? ○ Who will monitor performance of these tasks? ○ How often will monitoring be done? ○ Would you like assistance in this area of program development? <ul style="list-style-type: none"> ● Provide Financial Management Services <ul style="list-style-type: none"> ○ Who will do this? ○ What tool(s) will be used? ○ What experience/qualifications/preparation do staff/contractors have? ○ How will the FMS be paid? ○ Are performance standards developed for this task? ○ Who will monitor performance of these tasks? ○ How often will monitoring be done? ○ To whom, how often, and what information will the FMS be required to provide? ○ From whom, how often, and what information will be provided to the FMS? ○ How are expenditures tracked and reported? ○ What receipts and verification are required from participants? ○ What is the back-up plan if the FMS payment system fails? ○ Would you like assistance in this area of program development? ● Provide Support Services which facilitate service delivery 	

Program Elements	Questions	Responses
	<ul style="list-style-type: none"> ○ Who will do this? ○ What tool(s) will be used? ○ What experience/preparation have staff/contractors had for this in a participant-directed model? ○ Are performance standards developed for this task? ○ Who will monitor performance of these tasks? ○ How often will monitoring be done? ○ Would you like assistance in this area of program development? <ul style="list-style-type: none"> ● Facilitate utilization of traditional service providers (as part of the service plan) if desired. <ul style="list-style-type: none"> ○ Who will do this? ○ What tool(s) will be used? ○ What experience/preparation have staff/contractors had for this in a participant-directed model? ○ Are performance standards developed for this task? ○ Who will monitor performance of these tasks? ○ How often will monitoring be done? ○ Would you like assistance in this area of program development? 	
Program Administration	<p>Who is responsible for VDHCBS? Describe staff position(s) and roles and responsibilities including person responsible for operations.</p> <p>At what level of enrollment will additional staff be needed?</p>	

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	Is your provider agreement signed with the VA?	
	What is your projected start date?	
	Do you have a hiring freeze or anticipate any other impediment to adding new staff as enrollment grows?	
	What is the role of the SUA, the AAA and the local VAMC?	
	How is information communicated between the SUA, AAA and VAMC?	
	What Information Systems do you have in place for information collection and transmission (e.g. demographics, service plan, assessment, utilization)?	
	How are information and payment/billing discrepancies between SUA/AAA/Counselor/FMS/VAMC resolved?	
	Are MOUs, agreements or contracts in place for each subcontractor or partner with operational responsibility? Do they specify roles and responsibilities?	
	Who maintains spending plans, expenditure information, and reconciliation reports	
	Are all entities working with participant data HIPAA compliant?	
What data is to be submitted to the VAMC and how often?		

Program Elements	Questions	Responses
	<p>What system or method is used for communication between the FMS, Support Broker, Participant and Program Administrator?</p> <p>What information system is used for tracking business (client contacts, subcontracts, resources expended, service utilization and for billing)?</p> <p>What is the source for direct service dollars?</p> <p>Are co-payments required from participants?</p> <p>What is the process for monitoring your business activities?</p> <p>Reimbursement is sent from the VA after the service is rendered and billed. How will the SUA/ AAA and other contracted entities (e.g., FMS) manage with this delayed flow of funds?</p> <p>Do you need assistance in developing performance and monitoring standards for the elements of participant-directed programs (e.g. FMS, Support Services)?</p> <p>How will the new program be introduced in the community? To other stakeholders? To sister agencies?</p> <p>Would you like any other assistance in this area?</p>	
<i>Eligibility and Referral</i>	Describe the process from when a person comes to you or is referred until he/she has a service plan fully implemented.	

Program Elements	Questions	Responses
<p><i>Policies and Procedures</i></p>	<p>What management opportunities will be offered to participants (e.g. ability to recruit, hire manage and dismiss workers, purchase goods, services, equipment or supplies)?</p> <p>Will participants hire workers directly as a common law employer? Or will an agency be the common law employer of workers and the participant the managing employer?</p> <p>What will be your policies for representatives who assist participants who need help managing services?</p> <p>Will you allow participants to hire a legally responsible relative to provide services? (e.g., spouse, legal guardian)</p> <p>What services might the participant direct? (e.g., personal care, respite, home health, etc.)</p> <p>Are minimum qualifications described for workers who provide services? Who specifies these? (e.g., AAA, participant, etc.)</p> <p>Will any worker background checks be performed? If so, will background checks be reviewed? By whom? Will anyone other than the participant determine if a worker is approved for hire?</p> <p>How will over and under expenditures of the client’s service plan be handled?</p>	

Program Elements	Questions	Responses
	<p>Will the participant be able to set the hourly rate of pay for his or her worker?</p> <p>Do program participants have the ability to select and manage their own workers? Set their rate of pay?</p> <p>Will benefits (e.g., health insurance, sick or annual leave) be offered to participant-hired workers?</p> <p>Do program participants have the ability to purchase goods and services? If yes, are program restrictions on items specified?</p> <p>Might a program participant accrue savings to purchase a major item?</p> <p>How will duplications with VA-offered services be prevented?</p> <p>Are roles between FMS, support counseling, case management and participants clearly delineated with policies and procedures?</p> <p>How will services be coordinated between the VAMC and AAA/SUA?</p>	
<p>Financial Management Services</p>	<p>General</p> <ul style="list-style-type: none"> • Please verify that veterans will have both employer and budget authority. • Are you contracting with an established FMS in your state? If so, what is the entity and who monitors the FMS activity currently? • Who provides financial management services (e.g., paying employment and payroll taxes, processing timesheets, and paying invoices for goods and services) to the participant? * • Have opportunities to partner with other self-direction programs with FMS 	

Program Elements	Questions	Responses
	<p>been explored?*</p> <ul style="list-style-type: none"> • How is the quality of financial management services monitored? • How will the FMS make records available for immediate review by the AAA, SUA or VA? • Has a policy and procedure been developed and agreed upon for the FMS to report suspected fraud, participant safety and other issues to the AAA or other stakeholders? • Does the FMS have policies and procedures documenting each task performed by the FMS? • Has the FMS developed a disaster recovery plan for restoring software, master and electronic files and hard copy files? • Does the FMS have appropriate staff and staffing levels to support the complexity and volume of the program? <p>Budget Management</p> <ul style="list-style-type: none"> • How is assistance provided to participants to manage their budget? What is the FMS' role to support the participant to manage their budget? • How are over expenditures or under expenditures identified and to whom are they reported? <p>Service Payments, Reimbursements, Reports</p> <ul style="list-style-type: none"> • What is the process for the FMS to report participant service amounts to the AAA? • Is the FMS prepared to comply with all requirements regarding authorizing payment to back-up or emergency workers? • Has the FMS met all state and local requirements for securing electronic data? <p>Tax, Labor, and Workers' Compensation Rules and Regulations</p> <ul style="list-style-type: none"> • Describe the process by which the FMS will comply with state laws and rules applicable to worker's compensation benefits.* • Have state income tax, unemployment insurance and workers' compensation law requirements for directly hired workers in the state been explored? Has 	

Program Elements	Questions	Responses
	<p>this cost been considered?</p> <ul style="list-style-type: none"> • Does the FMS have systems, policies and procedures to obtain authorization from the IRS and the participant employer to serve as an IRS 3504 Agent per Notice 2003-70 for participants that are the employer of record for their directly hired workers?* • Does the FMS have a system or process to record worker tax exemptions and withhold federal, state and local taxes from each payment accurately and in accordance with current income tax withholding tables?* • Does the FMS have a system, policies and procedures to ensure that participants are provided all required tax account establishment and other employer enrollment forms prior to serving as the employer of record for their directly hired workers? * • Does the FMS have a system, policies and procedures to ensure that workers are provided all required tax and other employee enrollment forms prior to serving as employees for the participant?* • Does the FMS entity have systems, policies and procedures to correctly issue year-end information returns to employees and independent contractors?* • If participants are directly hiring workers and serving as the employer of record of those workers, does the FMS have a process to manage employer and employee taxes on behalf of each individual participant employer? This includes managing FICA/FUTA exemptions and thresholds between each participant employer and worker.* • Does the FMS have processes and systems in place to manage participant federal employer taxes per Section 3504 of the Internal Revenue Code and Notice 2003-70 for participants that are the employer of record of their own workers?* • How will the AAA ensure that the FMS activity is in compliance with all federal, state and local laws and regulations? • How does the AAA ensure participants are not personally liable for tax responsibilities on which the FMS defaults? • Does the FMS have a documented policy and procedure for staying up-to-date with applicable tax, labor and other regulations as they apply to FMS services?* 	

Program Elements	Questions	Responses
	<ul style="list-style-type: none"> • Does the FMS have a system, policy and procedure for either reviewing applicable forms to determine worker eligibility or supporting participants to review and execute such forms (e.g., US CIS Form I-9)?* <p>Customer Service</p> <ul style="list-style-type: none"> • Have FMS Customer Service hours of operation and phone numbers been established and communicated to stakeholders? Does the FMS have a system, policy and procedure for providing service during published hours at published phone numbers? • What role does the FMS serve in supporting participants to complete tax forms to become an employer of directly hired workers (if applicable)? • In what formats (e.g., in person, by phone, by e-mail, by webinar) does the FMS provide customer service to the participant? • What rules or guidelines exist regarding with what stakeholders the FMS is permitted to communicate? Can the FMS provide information to anyone the participant appoints? To workers? To family members? <p>Does the FMS have all required accommodations in place to communicate with stakeholders (e.g., TTY line, translation capability, alternate/large print capabilities)?</p>	
<i>Participant Involvement</i>	<p>How does the AAA involve participants in the development and management of the participant-directed program?</p> <p>Do you have an Advisory Group, or plan for an Advisory Group with veteran participation?</p> <p>What will be the means to keep participants informed about program changes and/or updates? How will you provide this in multiple language/accessible formats?</p>	
<i>Quality Management and Improvement</i>	<p>What performance/quality indicators will you use to measure the CLP/VDHCBS?</p> <p>How will the opinions/satisfaction with participant service arrangements be gathered,</p>	

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	<p>analyzed and published?</p> <p>Is an individual back-up plan in place if hired worker fails to show and the potential to jeopardize the health and welfare exists because of this failure to show?</p> <p>Does the AAA currently participate in an incident reporting system? If yes, how information about veterans and incidents be reported? If no, what is the AAAs plan to report and manage incidents?</p> <p>Does the AAA currently participant in a risk management system? If yes, describe. If no, how will the AAA identify and manages risks?</p> <p>Are incident and risk management systems respectful of the participant-directed approach?</p> <p>How will the AAA monitor the well-being of participants?</p>	
<i>Technical Assistance</i>	<p>Do you have any other technical assistance needs?</p> <p>Do you feel you have an item or items that might present as a promising practice?</p>	