

Appendix II: The Consumer Direction Module

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Appendix II

The Consumer Direction Module¹

Information technology designed specifically for self-direction programs can empower participants by giving them a timely, efficient, user-friendly tool for completing required paperwork and for interacting with their counselors (also called support brokers, support coordinators, and other names) and financial management services (FMS) providers to manage their individual budgets. This same information technology can also be configured to serve as a management information system to assist state program administrators in monitoring participants' use of their budgets and evaluating the program's performance on a wide range of indicators.

Information technology is already widely used to administer Medicaid programs. For more than 25 years, the federal government has required states to have computerized Medicaid Management Information Systems (MMIS) to process provider claims and to generate a variety of reports on service utilization and expenditures; states must also comply with federal data reporting requirements.

With respect to Medicaid-funded home and community-based services (HCBS), many states also employ standardized assessment tools to make coverage determinations and store the assessment data in computerized information systems, which can be linked to the MMIS. This enables program administrators to measure, for example, the service utilization/expenditure patterns of Medicaid program participants by disability profile, and also to monitor whether and to what extent they receive the services authorized on the basis of their individual needs assessment.

These existing information technologies are intended solely for the use of Medicaid program administrators and their contractors and/or providers of traditional Medicaid services. The design of information technology for self-directed services poses a whole new set of challenges because, in addition to these users, some of the functions of the technology must also be available to program participants and/or their representatives (hereafter, participants).

This Appendix describes an information technology developed for and designed specifically to meet certain unique requirements of self-direction programs. This technology—called the Consumer Direction Module (CDM)—is a secure web-based software application specifically designed to support self-direction programs that provide individual budgets. The CDM can also be linked to states' MMIS and assessment databases, if a state elects to do so.²

For participants, the CDM makes it possible to monitor the financial status of their accounts by accessing monthly accounting statements, to develop and revise

their spending plans electronically, and to share their proposed plans quickly and efficiently with their counselors (if the state has delegated authority to them to approve routine expenditures) and with state program officials (who must review and pre-authorize proposed spending on non-routine goods and services).

The use of Excel spreadsheets allows the electronic template to be programmed to automatically add in payroll taxes and other required costs associated with workers' wages (e.g., overtime payments when applicable). Similarly, the template makes it easier to ensure that proposed spending does not exceed participants' allowance or available funds. Moreover, forms filled out electronically—unlike traditional paperwork—are always legible, and therefore avoid some of the delays that can occur when traditional paperwork cannot be processed because it is illegible.

For providers of support services—counselors and FMS entities—the CDM similarly streamlines and speeds up communication both with participants and with each other. The CDM also facilitates record-keeping and can be programmed to generate routine reports and reminders, for example, that a regularly scheduled visit or phone call is due.

Finally, the CDM enables state program administrators to monitor individual participants' enrollment status and their individual accounts as well as to track aggregate statistics such as the number of enrolled and disenrolled participants and reasons for disenrollment; aggregate expenditures by participants; and types of goods and services approved for purchase. Program administrators can also determine, both for individuals and in the aggregate, the time lag from enrollment to development and approval of a spending plan and the start-up of self-directed services. They can also monitor the extent of under-spending and/or savings being accumulated on an individual and aggregate basis. Having such information immediately accessible is invaluable for quality management and continuous quality improvement strategies.

The Consumer Direction Module: Overview

The purpose of the CDM is to:

- Facilitate and simplify communication among participants and program staff
- Facilitate the timely processing of program information
- Provide data in reports that permit timely and efficient monitoring
- Improve quality by creating program efficiencies and providing timely information to program participants and administrators.

The CDM software, initial training, and materials on installation and use are available at no cost through the National Resource Center for Participant-Directed

Services (hereafter, the Center). There is a cost for vendor support during installation and states are responsible for installing and supporting the software as they would any other business system.

The Center is available to assist states that want to implement the CDM to prepare for implementation by reviewing user roles, adapting the CDM to fit a state's program, and providing training and one-time data uploads. States do not have to have received a C&C grant to receive assistance from the Center.

CDM Technical Features

- The CDM is a web-based application
 - The software is installed on one computer, a PC server, which is accessed through the Internet using commonly available web browsers.
 - Some customization for each state is possible.
- The CDM is a local system, with no interfaces allowing communication between the CDM and other computer systems supplied. Each state determines what interfaces it wants and is able to develop.
- The CDM requires some data transfer with the financial management services (FMS) agency (or FMS provider) to provide spending plan information and to gather information about participants' expenditures.
- The CDM meets all applicable HIPAA regulations.
- The CDM does not process receipt and disbursement of funds to and from each state's Medicaid financial system.

Development and Current Use of the CDM

States that received Cash & Counseling (C&C) grants were offered the opportunity to help develop and/or adopt the CDM. Some chose not to do so because they were concerned that the CDM might overlap and prove incompatible with or inferior to their states' own current or planned information systems.

Alabama, Rhode Island, and West Virginia each provided a program and information technology representative to serve on the CDM steering committee during the development phase, and New Mexico joined the steering committee during the testing phase. Participation on the steering committee enabled these states to have input into the development of the CDM and to help ensure that it met their needs.

Currently, Rhode Island and West Virginia are using the CDM. Alabama installed the CDM in a test region and is preparing for implementation in this region. New Mexico installed the CDM in spring 2007 in a test region and is preparing for statewide implementation in 2008.

Who Can Use the CDM?

The following individuals with a role in a self-direction program can use the CDM:

- Participant
- Participant Representative
- Legal Guardian
- Support Broker Agent & Agency
- State and Local Program Office
- FMS Agent & Agency
- State Administrator
- System Administrator
- Guest User

States can customize the terms used to describe various roles in the program. For example, states may use the term “resource consultant” or “counselor” rather than “support broker.” Once the term is changed in the CDM, the change will be reflected throughout the CDM. States need to be aware of the default user names since they will be referred to in the system and state administrator pages as well as the user manuals. Editing the user manuals is discussed later in this Appendix. The ways in which these individuals can use the CDM are described next.

Participants

The CDM serves as participants’ Internet link to people and agencies that help them direct their personal care services. Participants can use the CDM to develop their spending plan and can access their file at any time to view monthly budget statements, edit their file, and enter comments.

Participants are encouraged to use the CDM because it will make it easier for them to obtain forms (e.g., employment forms) and information about the program, manage their budgets, and communicate with those who help them to direct their services. The budget management features include the ability to

- Complete a spending plan form
- Submit a spending plan for approval
- View monthly reports of income and payments made from the account
- Check account balance and savings

Participants' Representatives

Participants may select someone to help them make decisions and manage employees. Once participants designate a representative, that individual's role will be reflected in the participants' file, including whether the participants have authorized the representative to use the CDM on their behalf (e.g., authorization to read, change, or add to pages in the CDM).

Legal Guardians

Participants' legal guardians can use the system in place of the participant, and their authority will be reflected in the participant's CDM file. The support broker will identify the authority of the legal guardian, as specified by the state. Participants with legal guardians are able to read everything in their file, but may not change the information.

Support Broker Agent & Agency

Support brokers can use the CDM to manage their caseloads. The CDM provides immediate access to the files of participants in their caseloads and to other program forms and reports. Additionally, it automates many program communications.

Support brokers can use the CDM to:

- Get information from and submit information to participants' files
- Update participants' information
- Download blank expenditure/spending plan (Excel worksheet) and other forms
- Upload completed participant-directed budgets
- Make changes to participant-directed budgets at the participants' direction
- Enter observations made during contacts with participants
- Check participants' account balances at their request
- Receive alerts and notifications about changes in participants' files
- Generate reports
- Send broadcast messages to other CDM users

In addition to the support broker functions listed above, support broker agency users will also have the administrative authority to add support brokers to the CDM.

State and Local Program Staff

State and local program staff (1) ensure that the program's policies and procedures are reflected in the CDM; (2) work with the state system administrator to configure the CDM to their state's program; and (3) use the CDM on a daily basis for management and administrative tasks such as approving participants' spending plans and monitoring the program. The CDM greatly facilitates program management and administration by providing both real time access to information and aggregated reports.

State and local program staff can use the CDM to:

- Create an entry for a new participant
- Assign a support broker or FMS agency
- Approve participant-directed budgets (responsibility may vary by state)
- Monitor participant-directed budgets, changes in the budgets, and participants' spending
- Review support broker case records
- Review reports from FMS agents
- Edit participants', support brokers', and FMS agencies information included in the CDM
- Send messages to other user groups
- Close a case
- Generate reports

Financial Management Service Agent & Agency

FMS agents are an essential program support for participants. They allow participants who are employers-of-record but who have limited employer knowledge and skills to control their budget and manage their employees. By handling the payroll, check writing, and taxpaying associated with participants' approved spending plans, the FMS agent ensures that the program spends Medicaid funds lawfully and that all spending is accurately documented.

FMS agents can use the CDM to:

- Enter employee information in participants' files
- Receive participants' spending plans and changes made to the plan
- Receive changes in participants', support brokers', and workers' information

- Send the monthly report of income and payments made for participants
- Generate other reports

In the CDM, a person working in an administrative capacity in a financial management services agency is called by the role name “FMSA Admin” or “FMSA.” In addition to all of the FMS agent functions listed above, FMSA users will also have the administrative authority to:

- Create FMS agent users in the CDM
- Determine and input the tax rate for spending plans

State Administrators

State administrators have the same authority as state and local program staff. In addition, they are allowed to configure the CDM for their specific program use and can perform the same administrative functions as system administrator users (see below). State and system administrators are encouraged to work together to configure the CDM for their state program’s use.

In addition to having access to state and local program user functions, state administrators can use the CDM to:

- Add or change users
- Upload the program logo
- Configure spending plan categories
- Establish permissions by role
- Establish state-specific role names
- Add a financial management service agency
- Add a support broker agency
- Determine values for dropdown lists
- Maintain item and service codes
- Add or change affirmations
- Create special fields
- Set required fields
- Set homepages for users
- Set role communications including alerts, notifications, reports, and notes

System Administrators

System administrators are responsible for the initial setup and ongoing maintenance of the CDM. The CDM is a very flexible system that allows system administrators to configure it to accommodate specific state program decisions. This configuration determines whether icons, tabs, and fields appear on the CDM screens viewed by all other users, and what users are able to do. The configuration can also be changed after program implementation.

See the state administrator functions above for examples of functions for system

administrators. With the exception of state and local program user functions, state administrators and system administrator have the same privileges.

Guest Users

The CDM has four guest user roles that can each be configured for use by different groups, for example, contracted assessment personnel or program evaluators. Each guest user role can be configured differently (e.g., to permit access only to specified reports). More than one person may be assigned to each guest user role.

Primary Features of the CDM

The CDM has five unique features: the participant file, the spending plan, the monthly expenditure statement, reports, and state configurability. Each is described below.

Participant File

Participant files have 10 main sections/pages:

- ***Personal:*** Lists personal and contact information.
- ***Program:*** Contains administrative details about program participation, for example, the date of enrollment and the date of last assessment.
- ***Financial:*** Contains the budget, spending plan, and monthly statements.
- ***FMSA:*** Displays the name and contact information for the financial management services agency that will assist with employer-related bookkeeping tasks.
- ***Support Broker:*** Displays the name of participants' support brokers and contact information for them. If the support broker works for an agency, the agency information will also be shown in this section.
- ***Medical Provider:*** Displays a page of information about the participant's primary care physician and other medical providers.
- ***Participant Representative:*** If a participant has a representative, the representative's contact information will be displayed on this page.
- ***Legal Guardian:*** If a participant has a legal guardian, this page will list the contact information.
- ***Employee:*** Contains a list of the participant's employees.
- ***Notes:*** Includes all notes written in a participant's file by all CDM users.

The participant file is described in further detail in the user manual. CDM user permissions can be configured to view, edit, and add information to the participant file as needed.

Participant Spending Plan/Monthly Expenditure Statement

Once their budgets have been approved, participants are able to create a spending plan in the CDM using an Excel spreadsheet. (See sample form below.) When the plan is ready to be reviewed, the Excel spreadsheet is uploaded into the CDM for other users to view as needed.

FMSAs use the same form (with different formulas) to give participants a monthly statement showing how their budget was spent. The statement is downloaded from the CDM by FMS agents to populate with expenditure data. Once completed, the FMS agents are able to upload the monthly statement into the CDM and it will populate the participant's file so other users can view the information.

Reports

The CDM is programmed to provide numerous reports to help states monitor their self-direction programs. The system allows users to easily generate other reports based on information stored in the CDM.

The CDM includes a set of default reports and allows users to create ad hoc reports as needed. The default reports are

1. Demographic Characteristics of Participants
2. Amount of Monthly Budget
3. Spending as of End of Month
 - Participants by Percent of Authorized Budget Spent at End of Month
 - Participants with More than 100% of Budget Spent by End of Month, by Support Broker
 - Participants with Less than 95% of Budget Spent by End of Month, by Support Broker
4. Savings Plan Report
 - Participants by Dollar Amount of Goal of Savings Plan for Specified Purpose
 - Participants by Percent of Authorized Budget in Savings Plan for Specified Purpose
 - Participants by Dollar Amount Saved in Savings Plan for Specified Purpose

- Participants by Savings Accumulated as a Percent of Savings Goal
- Participants with More than 100% of Savings Goal Accumulated But No Purchase Made, By Support Broker
- 5. Assessment Report
 - Participants by Time to Next Regularly Scheduled Assessment
 - Participants with Regularly Scheduled Assessments Past Due by 30 Days or More, by Support Broker
- 6. In-Person Monitoring Report
 - Participants by Time to Next Regularly Scheduled In-Person Monitoring
- 7. Incident Tracking Report
- 8. Grievance Tracking Report
- 9. Appeals Tracking Report
- 10. Report on Time from Enrollment to Receipt of First Services under a Budget
 - Number and Percent of Participants by Time to Receipt of First Services under a Budget
 - Percent of Enrollees Who Had Not Received Services under a Budget 90 Days after Enrollment for the Each of the Last Twelve Months, by Month
- 11. Enrollment and Disenrollment Report
 - Cumulative through the End of Month X
 - Detail on Reasons for Disenrollment
 - Enrollment in Each of the Last Twelve Months, by Month
- 12. Enrollment in the program, by Referral Program
- 13. Recipients of Services Under an Individual Budget and Dropouts, by Referral Program

Ability to Tailor the CDM to Each State's Program

The CDM was designed to allow states to configure the software to their specific program features. Some of the items that can be configured are:

- Application settings
 - User and password configuration
 - State customization

- Field configuration
 - Special fields
 - Required fields
- Financial
 - Spending plan categories
 - Spending plan columns
- Affirmations (under Application settings)
- Drop down lists
- Roles and permissions
 - Role names
 - Role permissions
- Alerts and notifications
 - Alerts (without editing recipient lists)
 - Notifications (without editing recipient lists)
- Upload forms and reports
- Edit role communications
- Define Local Program Offices
- Set FMS Agencies
- Set Support Broker Agencies
- Add users

The system administrator manual thoroughly describes all of the items that can be configured and the user manual index identifies the default settings in the CDM system for each configurable item. The CDM is delivered to states with the default configurations as a starting point.

Costs and Resources to Implement the CDM

When determining whether to use the CDM, states need to consider its cost—both initial and ongoing—as well as available training and materials, future enhancements, and technical assistance from the National Resource Center for Participant-Directed Services. Each of these items is discussed below.

Costs

The current vendor cost for assisting states to install the CDM, including 40 hours of technical phone support, is \$5000. The source code, installation manual, and user manuals are supplied at no cost in return for providing aggregate data to the Center.

In addition, an optional one-time upload of existing program data currently costs \$5,000. The one-time upload option allows states with existing program data to load it into the CDM rather than manually entering it.

Costs for creating an interface between the CDM and other state software systems are borne by the state. Based on input from the CDM steering committee, staffing requirements to maintain and support the system are estimated in the table below.

Estimated Resources to Maintain the CDM and Support Users	
Management Resources	Hours per Month
State Managerial Oversight	2
State CDM Administrator (can be a non-technical person)	12
Help Desk	12
IT Resources	
Network Administrator	4
Database Administrator*	1
Developer/Report Writer*	3
Total	32

* One person can fill both positions.

User Manuals & Training

User manuals for each role in the CDM (excluding guest roles) are provided. These manuals are also available in Word format to allow states to edit them to reflect their customization of the CDM. For example, if a state changes the term “support broker” to “counselor”, this change can be made in the support broker manual. The manuals include both text explanations and illustrations of the CDM.

Enhancements

Since the start of the CDM project, a number of enhancement requests and ideas have been generated by the CDM steering committee and users. Small enhancements have been made to the CDM and the Center maintains a list of proposed enhancements for future consideration.

An enhancement project was completed in early 2008, which will allow FMS agencies to obtain and distribute all participant spending plan and monthly statement data from the CDM at one time, rather than having to access this information through each individual participant's file. This FMSA Data Connector Project includes functionality that will decrease the amount of time FMSA users will need to retrieve spending plan information as well as reduce the data entry time for providing monthly statement information.

The steering committee continues to meet to provide oversight on CDM enhancements and requests for enhancements and to provide support for states both using and preparing to use the CDM. States interested in the CDM are encouraged to join the steering committee to obtain more information on the CDM and for support in the implementation process.

Endnotes

- 1 Angela Sutkaitis is the lead author of this Appendix. Pamela Doty is a contributing author.
- 2 The US Department of Health & Human Services, Office of the Assistant Secretary for Planning and Evaluation funded the development of the Consumer Direction Module. The Robert Wood Johnson Foundation and the Administration on Aging provided some additional funding.