



AAW SCO QUALIFICATION PROCESS

January 12, 2022

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Today's training is intended to be for SCOs of the AAW. If you are an SCO who only provides services in the ID/A waivers, this training is not applicable to you. In addition, if you are a Provider or Administrative Entity, this training is not applicable to you either.

Also, please note that if you're enrolled as an SCO in both the AAW and ID/A waivers (and there are currently six SCOs who are dually enrolled), you will need to follow BOTH THE AAW REQUAL PROCESS AND the BCS' requalification process that is separate and distinct from this process.

Agenda



- Purpose for the changes
- ODP Announcement 20-111
- SCO Qualifications Documentation Record
- SCO Primary and Secondary Contacts
- Questions

Today's discussion will include:

- The purpose for the changes
- A review of the qualification and requalification process for SCOs outlined in ODP Announcement 20-111
- A review and walk through of the SCO Qualification Documentation Record
- And some reminders including the need to submit SCO Qualification Primary and Secondary Contacts

Purpose



- CMS Requirements
- Process alignment
- Consistency
- Uniformity
- AAW Performance Measures

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- The Centers for Medicare and Medicaid Services (CMS) requires a statewide process to ensure SCOs and providers are qualified to render services to waiver-funded individuals.
- Previously, AAW SCOs were requalified during annual monitoring and the Quality Assessment and Improvement (QA&I) process.
- BSASP has replaced that process with the AAW SCO Qualification Process that was announced in ODP announcement 20-111. This change occurred in Jan 2021 and this is the second year of our first three-year requalification cycle using this process for AAW SCOs. Please note that ODPANN 22-001 was distributed through the AAW SCO listserv announcing the start of the second year of the AAW SCO Qualification Process beginning on 2/1/22. Copies of both announcements are included in the chat/hand-outs section and can also be found on MyODP.
- As many are aware, BSASP has been actively working towards the alignment of processes, where possible, to maintain consistency and uniformity across ODP programs for our SCOs and Providers. The transition to this process is an example of those efforts.
- This SCOQ process also allows us (BSASP) to collect data for AAW CMS Performance Measures related to agency and staff-level qualifications and training requirements.

- New SCOs
 - ◆ First Requalification
- Existing SCOs
 - ◆ Requalification

- The AAW SCO Qualification Process is described in ODP Announcement 20-111 and over the next few slides, we're going to review several of the key points detailed in that announcement.
- And one of the first things we are going to talk about is when qualification occurs.
- New SCOs, of course, must be qualified prior to enrolling to provide SC services.
- Following the SCO's initial qualification date, all SCOs classified as New are to be requalified by the end of the following fiscal year. For example, if a New SCO's first Qualification Begin Date is 01/20/2021, that SCO must be requalified by 06/30/2022, which is the end of the following fiscal year.
- A New SCO's status is then updated from New to Existing after the SCO is requalified for the first time.
- In addition, Existing SCOs must be requalified at least once during a 3-year cycle thereafter.

SCO Qualification Cycles



Cycle 2		Last digit of MPI	Cycle 3		Last digit of MPI
Year 1	FY 20-21	0-2	Year 1	FY 23-24	0-2
Year 2	FY 21-22	3-5	Year 2	FY 24-25	3-5
Year 3	FY 22-23	6-9	Year 3	FY 25-26	6-9

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- The chart on this slide will likely look familiar to those involved in the QA&I Process.
- Once an SCO is classified as Existing, the SCO is to be requalified on a three-year cycle based upon the last digit of the SCO's MPI number as reflected in this chart.
For example: an existing SCO with an MPI number ending in "6", must be requalified by 06/30/2023 which is the end of that fiscal year.
- For this upcoming cycle, all SCOs whose MPI number ends in 3, 4, or 5, as well as any new SCOs who enrolled in FY 2020-2021 will be included in this second round of BSASP's SCOQ cycle. Please note that there are a few SCOs who participated in the SCOQ process last year as a new SCO that will have to participate again this year due to their MPI# ending in 3, 4, or 5.

*One additional thing I would like to mention is that the timelines for Cycle 2 of SCO Requalification process will be slightly different from the timelines for Cycle 2 of QA&I due to when the requalification process is starting and the corresponding Fiscal Year, as well as the implementation of two interim QA&I reviews. *

Service Qualification Statuses



- Qualified
- Expiring
- Expired
- Not Requalified
- Not Qualified

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During the SCOQ Process, BSASP will utilize an internal database to track SCOs as they move through the requalification process.

In the database, BSASP assigns each SCO one of the five statuses listed on this slide. While all of the statuses will be utilized, we are only going to focus on the first three during today's training.

Also, for those SCOs who are dually enrolled in the AAW and ID/A waivers, you are likely used to these statuses being captured in HCSIS for the ID/A waivers but, unfortunately, we are unable to use HCSIS for the AAW tracking which is why we are using an internal system.

The first status we want to review is the Qualified status which means that the SCO meets ODP's qualification requirements

An agency's status is changed from Qualified to Expiring on May 1st, if the SCO has not taken the appropriate steps to requalify

Then an agency's status is changed from Expiring to Expired on July 1st, if the SCO has not been requalified

Qualification Documentation



- AAW SCO Qualification Form
- AAW SCO Qualification Documentation Record
- All required supporting documentation

[AAW SCO Qualification Process \(MyODP\)](#)

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During the SCOQ Process, SCOs will be required to submit requalification documentation to BSASP that includes the following:

- The AAW SCO Qualification form – this is a document that includes basic SCO demographic information, SCO assurances & attestations, the Qualification determination, and BSASP's verification of those qualifications.
- The next item that needs to be submitted is the AAW SCO Qualification Documentation Record: this spreadsheet was created by BSASP to assist SCOs in documenting qualification and training information for SCO staff. It contains all instructions and qualification requirements and will be discussed more in depth a little later; and finally,
- The SCO must submit all required supporting documentation identified in the SCOQ Doc Record.
- Examples of Agency Level documentation includes valid insurance certificates with policy effective and expiration dates; copies of Certified Investigator Certificates or contract/agreements you may have with CIs outside your agency
- Examples of Staff Level Documentation includes copies of Criminal Background Checks, Copies of Training Certificates for AAW-Specific required trainings, Copies of transcripts or degrees, copies of resumes for proof of experience, copies of Annual Training and Orientation Training records and certificates per the 6100 regulations.

The link provided at the bottom of this slide takes you to the AAW SCO Qualification resources on MyODP, which includes copies of the AAW SCO Qualification Form and the

SCO Qualification Doc Record.

Timelines & Noncompliance Process



TIMELINE	ACTIVITY
FEBRUARY 1 to MARCH 31	This date range is the timeframe SCO AAW Qualification form, SCO Qualification Documentation Record and supporting documentation to ODP/BSASP. .
APRIL 1	ODP/BSASP will send warning e-mails to SCOs who have not submitted their required documentation.
APRIL 30, **DUE DATE**	SCOs who have not submitted their documentation by April 30 will be considered out of compliance with ODP waiver and regulation requirements
MAY 1	ODP/BSASP will identify SCOs not requalified by this date. If the SCO has not been Qualified or Not Requalified by April 30, then on May 1, the qualification status for the SCO will change to Expiring. ODP/BSASP can still consider an SCO as Qualified until the end of the fiscal year (June 30th), if the SCO submits their qualification documentation.

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SCOQ timelines and noncompliance process – these timelines are the same across each cycle year:

- Between **Feb 1st and March 31st**, SCOs included in the SCOQ cycle year must submit their SCO AAW Qualification form, SCO Qualification Documentation Record & all supporting documentation to BSASP.
- On **April 1st**, BSASP will send reminder/warning emails to SCOs who have not submitted the required documentation by the March 31st deadline. In that email, SCOs will be instructed to send the required documentation by April 30th.
- If BSASP does not receive the required documentation by **April 30th**, the SCO will be considered out of compliance.
- Then on **May 1st**, SCOs who are determined to be out of compliance and have not been requalified will have their status changed to “Expiring” and BSASP will begin the next steps described on the next slide.

Timelines & Noncompliance Process



TIMELINE	ACTIVITY
MAY 1 to MAY 15	<p>ODP/BSASP will send a "failure to comply" notification to SCOs who have been determined to be out of compliance. The notification will inform SCOs to begin transition planning activities for an alternate SCO in order to meet the assessed needs of the individual.</p> <p>SCOs who have not submitted their qualification materials by April 30 must begin transition planning activities with waiver individuals, and families they are currently serving.</p> <p>The intent of the transition planning activities is for SCs to offer individuals and families choice about an alternate willing and qualified SCO.</p>
MAY 15 to JUNE 30	<p>SCOs that are out of compliance with SCO qualification requirements may still qualify during this timeframe; however, there is no guarantee the existing SCO will continue service delivery to the individual because he or she may select a new willing and qualified SCO to render services</p> <p>If, during planning activities, the waiver individual chooses to begin service with an alternate willing and qualified SCO prior to July 1, the current SCO will be end-dated accordingly in the ISPs in HCSIS. When an individual chooses to transition to another SCO, the current SCO must participate in transitioning activities as per Chapter 6100.302.</p>

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- Between May 1st and May 15th, all SCOs who are out of compliance will receive a "failure to comply" notification from BSASP that describes the transition planning process for individuals they serve. In addition, SCOs will be instructed to begin transition planning activities with the applicable individuals.
- Between May 15th and June 30th, SCs will continue with transition planning activities and will offer individuals and families choice about alternative SCO(s).
- It's important to note that SCOs **may still qualify** during this time period, however, the individual may still choose to transition to a new SCO and that choice must be honored

Timelines & Noncompliance Process



TIMELINE	ACTIVITY
JUNE 30 Expiration Date	SCOs who are not Qualified by June 30, will be considered out of compliance regarding ODP requalification standards.
JULY 1	Effective July 1, the following actions will occur: <ul style="list-style-type: none"> • ODP/BSASP will confirm which SCOs are in Expired status • ODP/BSASP will review all SCOs in Expired status to determine steps to resolve any outstanding issues. Service authorizations will not be carried forward to the new fiscal year in ISPs. Both the SCOs service offerings in HCSIS and PROMISE™ enrollment(s) will be end dated June 30 by ODP/BSASP. When this action occurs, the SCO will no longer be able to receive payment for services rendered to individuals enrolled in the AAW.

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- If the SCO has not been requalified by **June 30**, the agency's status will change to "Expired" on **July 1st** and the associated service offering in HCSIS and PROMISE will be end dated accordingly. In other words, the SCO will no longer be authorized on an AAW ISP and will no longer be able to receive payment for services rendered effective July 1st.
- During the SCO's requalification year, from February 1 through June 30, ODP BSASP can change the SCO's status to "Not Requalified" or "Not Qualified" at any time, if the SCO's qualification is being terminated, if the SCO no longer meets ODP's qualification requirements, or if the SCO is no longer interested in maintaining a qualification status for the SC service.

- Qualified
- Incomplete submission
- Remediation needed

- Upon receipt of the SCO's qualification documentation, BSASP will review all materials and determine if the qualification standards are met.
- If the SCO has met all required qualification standards as evidenced by the documentation submitted, BSASP will consider the provider as Qualified.
- If the SCO, however, fails to include all the required qualification documentation in their submission, BSASP will notify the SCO by email of the missing documentation and give them an opportunity to submit what is missing within the appropriate timeframes.
- If remediation is required, the SCO will be required to submit verification of appropriate actions taken to resolve any issues found during the BSASP review.

SCO – Facilitating Transition Planning



- ODP will inform SCOs when the SCO has not submitted their qualification documentation by the due date of April 30.
 - ♦ SCOs are **strongly encouraged** to submit their documentation for re-qualification prior to the April 30 due date to eliminate the need for transition planning.
- Once notification has been received by the SCO, the SC will be responsible for initiating activities to assist participants working with the SCO with transition to a new, qualified SCO.

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We are now going to talk about the SCs role in this process if and when transition planning is necessary due to the SCO not requalifying.

- The following actions should be performed by the SCO:
 - Informing the individual and family that the SCO was not qualified by the due date and is at risk of not being able to render services as of July 1
 - Generate a list of available qualified SCOs who are willing and able to render the Supports Coordination service. This can be done by presenting the AAW Supports and Services Directory.
 - Schedule an ISP team meeting with the individual and family to review the list of SCOs that are qualified, willing, and able to provide the service necessary to support the individual's assessed needs and outcomes
 - The individual shall exercise choice in the selection of qualified SCOs. To support this, the SC will share the list of SCOs with the individual and family and instruct them to review the list. The SC documents this activity in service notes in HCSIS
 - If the individual chooses a new SCO, inform them that you will be sending a referral to the selected SCO. The SC is responsible for making prompt referrals to the SCO(s) selected by the individual. The SC documents this activity in the service notes in HCSIS
 - If at any point during the transition planning an alternate SCO is not

identified, the SCO should be in contact with ODP

SCO - Facilitating Transition Planning



- If the SCO completes the qualification process after the April 30 due date, but prior to the July 1 deadline when the status change occurs, SCOs will be notified that they can continue to provide services.
- SCs are responsible for informing the individual/family that he/she can continue working with the current SC or, if the individual has started the transition process, he/she can still choose to select a new SCO

AGAIN, SCOs are strongly encouraged to submit their documentation for re-qualification prior to the April 30 due date to eliminate the need for transition planning.

- If the SCO completes the qualification process after the April 30 due date, but prior to the July 1 deadline when the status change occurs, SCOs will be notified that they can continue to provide services.
- SCs are responsible for informing the individual/family that he/she can continue working with the current SC or, if the individual has started the transition process, he/she can still choose to select a new SCO

SCO APPEALS



- When an SCO's qualification status changes to Expired, the SCO will be unable to receive waiver payments for services rendered, that SCO has appeal rights under 55 Pa. Code Chapter 41.
- Any SCO with intent to voluntarily discontinue PROMISE™ enrollment to render AAW services with ODP must notify the AAW Provider Enrollment Lead at RA-PWBASPROVENROLL@pa.gov
- All SCOs enrolled to provide services to AAW individuals **must requalify even if they are not currently serving AAW individuals.**

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- When an SCO's qualification status changes to Expired on July 1, that SCO will be unable to receive waiver payments for services rendered on and after that date. The SCO **does** have appeal rights under 55 Pa. Code Chapter 41.
- ODP will notify SCOs that have expired services effective July 1 via a letter describing ODP's attempts to bring the SCO into compliance. This letter will include instructions on how an SCO may file an appeal.
- All SCOs enrolled to provide services to AAW individuals **must requalify even if they are not currently serving AAW individuals.**
- BSASP asks SCOs who wish to voluntarily disenroll to notify BSASP prior to the 4/30/2022 deadline to so that BSASP Reviewers can initiate disenrollment activities rather than continuing with written warnings and communications that are sent to SCOs who intend to remain enrolled.

- SCOs that serve as Organized Health Care Delivery Systems (OHCDs) must ensure that any vendor it contracts with meets all qualification standards prior to the provision of any service.
- During requalification, SCOs serving as OHCDs will include vendor qualification information for all contracted vendor services rendered or paid since their previous requalification on their submitted SCO Qualification Documentation Record.

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- SCOs that serve as Organized Health Care Delivery Systems (OHCDs) must ensure that any vendor it contracts with meets all qualification standards prior to the provision of any service.
- During requalification, SCOs serving as OHCDs will include vendor qualification information for all vendor services rendered or paid since their previous requalification on their submitted SCO Qualification Documentation Record.

*If an SCO does not hold a contract with a specific vendor for a service, the SCO is not required to include qualification information in the PQ Doc Record (i.e. the SC is an OHCDs for Public Transportation and pays for a bus pass through Septa or an OHCDs for AT and pays for an iPad through Apple)

REVALIDATION vs REQUALIFICATION



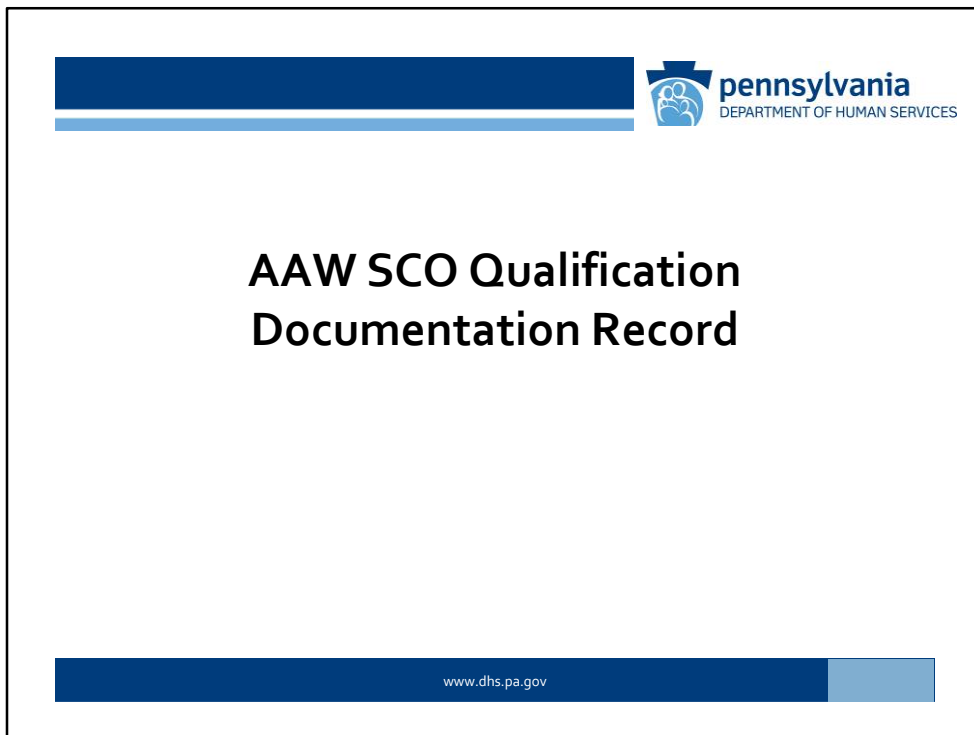
- SCOs are required to revalidate service locations within 5 years of initial date of enrollment and ongoing.
- Revalidation involves the submission of a new enrollment application through the On-line Provider Enrollment Application System
<https://provider.enrollment.dpw.state.pa.us/>.
- For the application to be approved, SCOs will need to attach an approved ODP SCO Qualification form that demonstrates qualification included in the revalidation application.

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Revalidation and Requalification are two different things. Requalification is managed by ODP, while Revalidation is a requirement for any provider with active Service Locations in PROMISe.

- SCOs are required to revalidate service locations within 5 years of the initial date of enrollment and ongoing. Revalidation involves the submission of a revalidation application through the On-line Provider Enrollment System
<https://provider.enrollment.dpw.state.pa.us/>.
- For the application to be approved, SCOs will need to attach an approved ODP SCO Qualification form that demonstrates qualification included in the revalidation application.
- For more information about the revalidation process, please review the Office of Medical Assistance Programs Bulletin Number 99-16-10 (Revalidation of Medical Assistance (MA) Providers).



As mentioned previously, the AAW SCO Quals Doc Record is an Excel spreadsheet that was created by BSASP to assist SCOs in documenting the qualification and training information for SCO staff. Please note that this form itself is not a requirement; SCOs may use their own form as long as it contains all the qualification elements requested in this spreadsheet.

SCO QUALIFICATION DOC RECORD



- The form includes 11 worksheet tabs:
 - ◆ Instructions
 - ◆ Agency Demographics
 - ◆ Agency-Owned Vehicles
 - ◆ Staff Qualifications
 - ◆ Annual Training Requirements
 - ◆ AAW Doc Requirements
 - ◆ AAW OHCDs
 - ◆ Criminal Records
 - ◆ Electronic Fingerprinting
 - ◆ Provisional Employment
 - ◆ Resources

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The SCO Quals Doc Record includes 11 worksheet tabs that are identified on this slide. Some of the tabs are informational only while others are only applicable to certain SCOs.

COMPLETING THE SCO QUALS DOC RECORD



- Instructions worksheet tab
- AAW Doc Requirements worksheet tab
- Resources work sheet tab
- Inquiries: ra-pwaawproviderqual@pa.gov

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When filling out the SCOQ Doc Record, please consider the following:

- Each section of a worksheet has a corresponding section in the instructions to help guide you.
- When in doubt, check the Instructions worksheet tab first.
- In addition to the Instructions tab, there is an AAW Doc Requirements tab as well as a Resources tab that include additional information and reference material.
- If you still have a question after reviewing the guidance and instructions, you can reach out to BSASP at: RA-PWAAWPROVIDERQUAL@pa.gov.

AAW Staff Sample Selection



- 25 staff currently working with AAW individuals
- If SCO has less than 25 staff, all staff will be included
- Exclude staff no longer employed by the SCO

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Staff included in the sample:

- As part of the requalification process, all SCOs are required to submit copies of supporting qualification documentation for up to 25 staff currently working with AAW individuals.
- If an SCO has more than 25 staff working with AAW individuals, it is up to the SCO to determine which 25 staff members to include.
- If an SCO has less than 25 staff, they should send in documentation for all staff working with AAW individuals.
- SCOs should exclude staff who are no longer employed by the SCO.
- If you are an SCO who is not currently providing services to any individuals in AAW, you will need to provide documentation for 1 staff member who must meet qualifications for the Supports Coordination service.



AAW SCO Qualification Documentation Record Walk Through

Submission of Documentation



- Submit all required documentation to ODP/BSASP at ra-pwaawproviderqual@pa.gov
- Agency name & MPI number in the subject line

- All requalification documentation that must be sent to BSASP should be sent to the email address listed on slide (again, the list of documentation that needs to be sent can be found in the AAW Doc Requirements tab).
- When sending the documentation, the SCO should include the name of their agency and MPI # in the Subject Line of the email.

Inquiries



- For questions related to the AAW SCO Qualification process, contact BSASP at:

ra-pwaawproviderqual@pa.gov

As mentioned before, if you've reviewed the guidance material and various resources and still have a question, you can email BSASP at the email address listed again on this slide.

SCO Contact Information



- Primary and secondary contact person(s)
- Due date: **close of business on January 15, 2022.**
- Link: <https://aawqualscontacts.questionpro.com>

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- SCOs need to identify a contact person(s) to receive specific information related to the AAW qualification process including any unique electronic links, access to AAW qualification process specific information, ongoing direction and communication from ODP regarding the AAW qualification process, etc.
- All SCOs must complete and submit their information using the link on the slide **by close of business on January 15, 2022.**

