

**Procedure for implementing Corrective Action Plans (CAP) for individuals on the
Consumer Directed Care Plus (CDC+) Program with negative balances
November 16, 2010**

The Area APD staff will meet with the consultants for the participants/representatives identified on the list of individuals with current negative balances. The purpose of this meeting will be to provide each consultant with the ending balances for each of their participants on the list and explain this procedure.

Procedure

A. The consultant will:

1. Meet with the participant/representative to explain the situation and inform them of the need to implement a CAP with a schedule of repayment that will start no later than December 6, 2010. A new Purchasing Plan must be developed to reflect the new monthly spending with an effective date of January 1, 2011. Face-to-face meeting is preferred, but telephone contact is acceptable as long as the required signatures on the CAP are obtained by fax or other electronic methods.
2. Listen to the participant/representative for their suggestions.
3. Identify what supports (training, technical assistance, etc.) would assist the participant/representative in correcting the problem.
4. Determine the amount and duration of unpaid, natural supports that are necessary to help resolve the negative balance using the tools provided with this procedure. Parties can use the form entitled ***Calculation of Number of Hours to be Provided by Natural Supports*** as a tool to help craft the CAP.
5. Ensure that restricted services funds or short-term expenditure (STE) and one-time expenditure (OTE) funds are not used to help resolve negative balances.
6. Ensure that no special purchases are approved to be purchased through the savings section of the Purchasing Plan for the duration of the corrective action plan, unless indicated by APD Staff.
7. Negotiate the corrective action plan by discussing different options based on the specific circumstances and writing down agreed upon action steps.
8. Not allow the corrective action plan to place an individual's health and safety at risk.
9. If the consultant cannot establish contact with the participant/representative within 5 business days, the consultant must document all attempts made to contact the participant/representative and provide this information to the Area CDC+ Liaison, who will address on a case-by-case basis.

B. The corrective action plan must include at a minimum:

1. The problem(s) which precipitated the need for a corrective action plan.
2. Action steps required to fix each problem including responsible person for completing each action step and timeline for completion.
3. Monthly updates by the consultant.

4. A statement acknowledging that the participant/representative will spend the monthly budget in accordance with the spending limits set forth in the corrective action plan.
5. The method of payment and amount to be paid.
6. A clear statement that the participant/representative will provide to the consultant copies of the completed and signed timesheets and/or invoices that were submitted for payment during the two inclusive pay periods until the CAP has been satisfied. This will ensure the expectations of all parties.
7. In the event that the participant/representative cannot identify an unpaid/natural support available to help resolve the negative balance, then provide a schedule of re-payment and the amount to be paid back by check directly to the APD / CDC+ program.
8. Begin date and targeted completion date. Targeted completion date must be no later than 12 months from the begin date. Exceptions can be requested by the consultant in writing and may only be for health and safety reasons. Exceptions must be agreed to and recommended by the Area Administrator and approved by the APD Central Office.
9. Monthly updates must be submitted by the consultant to the Area CDC+ Liaison. This will ensure the consultant can readily determine the participant's/ representative's compliance with the corrective action plan.
10. Date and signature of the participant/representative, consultant, APD Area Liaison and, the CDC+ staff at the APD Central Office responsible for overseeing corrective action plans.

C. Process for Approval of the CAP:

1. Once the consultant has met with the participant/representative to develop the CAP and it has been signed by both parties, the consultant will submit the CAP to the APD Area Liaison for review within 3 business days (or sooner if possible) from the date the CAP was signed.
2. The APD Area Liaison will date stamp upon receipt, review and forward, within 2 business days of receipt, to the APD Central Office at APD_CDC_Documents@apd.state.fl.us and copy the designated CDC+ staff, for review/ approval. If the CAP does not meet the requirements listed in section B of this procedure, the liaison needs to return it to the consultant to revise.
3. The APD Central Office staff will date stamp, review, approve, enter CAP details in the Central Office CDCFEA CAP area of the application, save CAP in consumer's Central Office e-folder and return the CAP within 2 business days of receipt, to the Area Liaison for implementation. The Area Liaison will inform the consultant that the CAP has been approved and provide a copy of the approved CAP to the consultant.

D. Monitoring of the CAP:

1. The participant/representative will provide to the consultant within 24 hours of the end of every two bi-weekly pay periods copies of the completed and signed timesheets that were submitted for payment during the two inclusive pay periods.
2. The consultant will compare the timesheets to the approved spending limits and will provide a status update to the Area Liaison on a monthly basis. If the consultant did not receive the documentation from the participant/representative

within the required time frame, this information would be included in the monthly report.

3. The Area Liaison will date stamp, review, scan and submit the update to the APD Central Office documents in-box and copy designated staff within 2 business days of receipt. Failure to submit the update by the consultant may result in sanctions imposed on the consultant by the agency.
4. Updates will be logged in and monitored closely by the APD Central Office staff. CDC+ Finance staff will generate monitoring reports by Area for consumers in negative status and provide to Central Office CAP staff for comparison and validation. Monitoring reports will also be shared with APD Leadership, Area staff and QA committee, as needed.
5. CAPs will be monitored until all individuals have successfully achieved correction of the identified problem(s).
6. Individuals who do not achieve correction of their identified problem(s) within established timeframes may be disenrolled from the CDC+ program and returned to the DD/HCBS waiver. The APD Central Office legal counsel will make the final determination.

References:

Calculation of Number of Hours to be provided by Natural Supports
Corrective Action Form
CDC+ Payroll Schedule