



Proposed SED Waiver Changes

The Kansas Department for Aging and Disability Services (KDADS) submitted the Serious Emotional Disturbance (SED) Waiver for renewal in Spring 2015. At that time, the Centers for Medicare and Medicaid Services (CMS) required the State to address structural conflicts of interest. CMS advised a structural conflict of interest occurs when Community Mental Health Centers (CMHCs) are the sole entity determining functional eligibility, developing the plan of care, and providing SED waiver services. KDADS consulted with the various CMHCs to address this issue and identify a process that would:

- Provide the least disruption in the SED waiver process
- Utilize existing systems to mitigate conflict
- Minimize impacts to CMHC services and delivery

KDADS has received tentative approval from CMS for the following proposed process changes to reduce the conflict of interest.

Conflict Free Functional Eligibility

KDADS proposes utilizing a third party contractor to administer the Child and Adolescent Functional Assessment Scale (CAFAS) assessments at the same time as the CMHCs. Proposed changes will allow CMHCs to continue functional eligibility assessments for the waiver. The interaction between the contractor and the CMHCs will be as follows:

- The contractor and CMHC will work together in scheduling assessments for the SED waiver
- The contractor will sit in during the evaluation conducted by the CMHC and fill out their own CAFAS during this time
- The contractor and CMHC will score the assessments independently of each other to ensure the CAFAS is administered correctly, found to be valid, and the client meets SED functional eligibility criteria
- The contractor will be responsible for being present during a statistically significant sample of new clinical eligibility assessments

Conflict Free Plan of Care (POC) Development

The current procedure has the wraparound facilitator (WAF) at the CMHC creating the plan of care (POC) and sending it to the managed care organization (MCO) for approval. The current MCOs serving KanCare and waiver participants are Amerigroup, Sunflower Health Plan, and UnitedHealthcare.

KDADS proposes CMHCs no longer create the POC and deliver services authorized by that POC. MCO care coordinators will work with CMHCs to create the POC for SED waiver services.

Changes to the Wraparound Facilitator (WAF)

The wraparound facilitator (WAF) role will change in a conflict free environment. WAFs currently form, assemble, and reassemble the wraparound team. This team consists of the participant's family, extended family, and other community members involved with the participant's daily life that can lend helpful information for the creation of the plan of care (POC). The chart below details the current role and the proposed role after implementing the strategies to reduce conflict of interest.

| Current WAF Role | WAF After Proposed Changes |
|--|--|
| Creation and ongoing coordination of the Wraparound Team | Creation and ongoing coordination of the Wraparound Team |
| POC creation* | |
| POC update and revision* | |

*services moving to MCO care coordinator.

Changes in the WAF role will result in fewer WAF hours available. WAFs will continue responsibility for reassembling the team when the POC is reviewed and/or revision is needed, at least annually or as needed based on changes in circumstances. All changes to the POC will be made by the MCO care coordinator with input from the wraparound team.