

NEW DIRECTOR TRAINING

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OHIC Grant Administration Overview: Policies and Reporting

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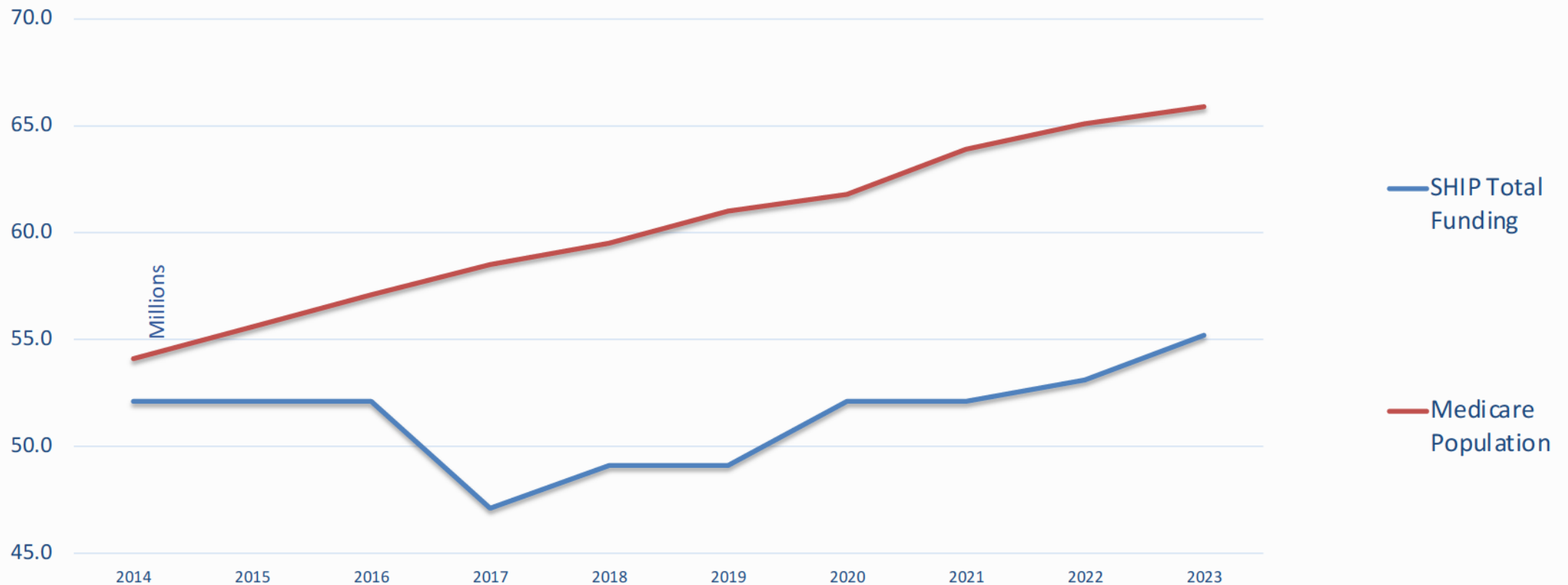
Structure of the OHIC Networks



- National **grant-based** programs
 - Grants in every state, DC, PR, GU, USVI
- Network relies strongly on partners and community-based organizations to provide local support and assistance
- Focus of all programs is to serve those in greatest need of our services.

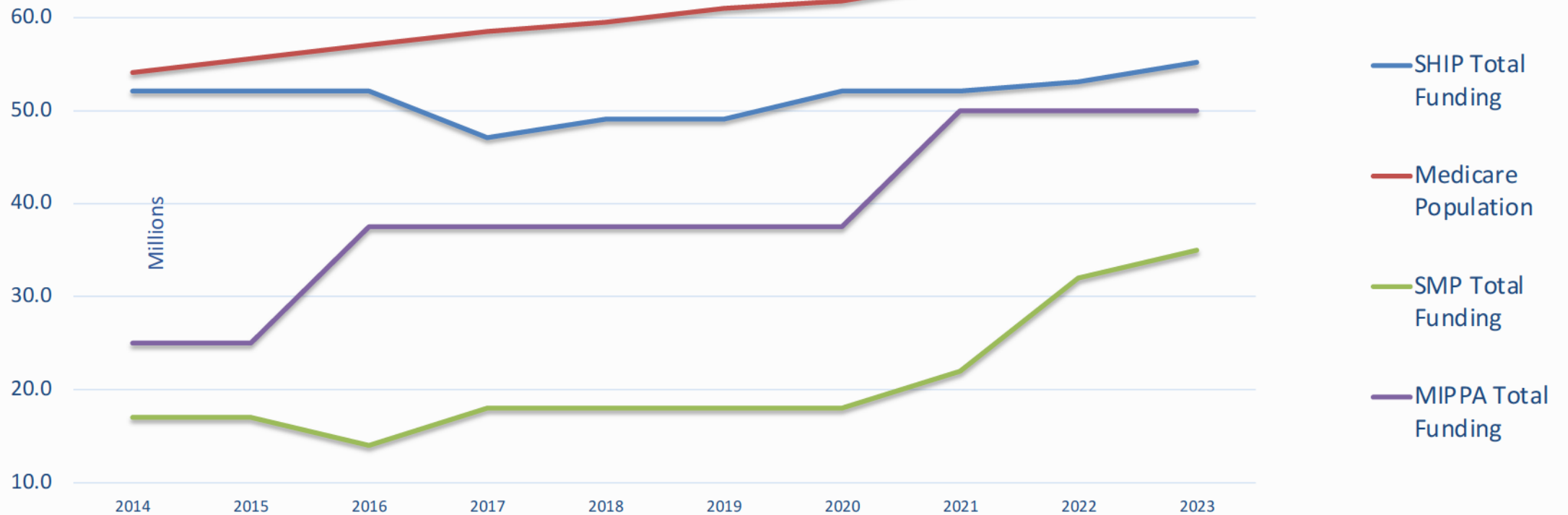
Funding has not kept pace with bene growth...

SHIP Federal Funding Compared to Medicare Population, 2014-2023



Funding has not kept pace with bene growth...

OHIC Federal Funding Compared to Medicare Population, 2014-2023



Funding Limitations and Expectations

Congress designed these programs to provide infrastructure and support to paid and volunteer workforce.

SHIP statute directs states to “provide for a sufficient number of staff positions (including volunteer positions) necessary to provide the services of the...program”.

SMP was “designed to recruit and train retired professionals... to identify and report error, fraud, and abuse”.

MIPPA is an additional funding source for the SHIPs, AAAs, and ADRCs to expand on work already being done. MIPPA was not meant to stand alone.

Establishing a Strong Network

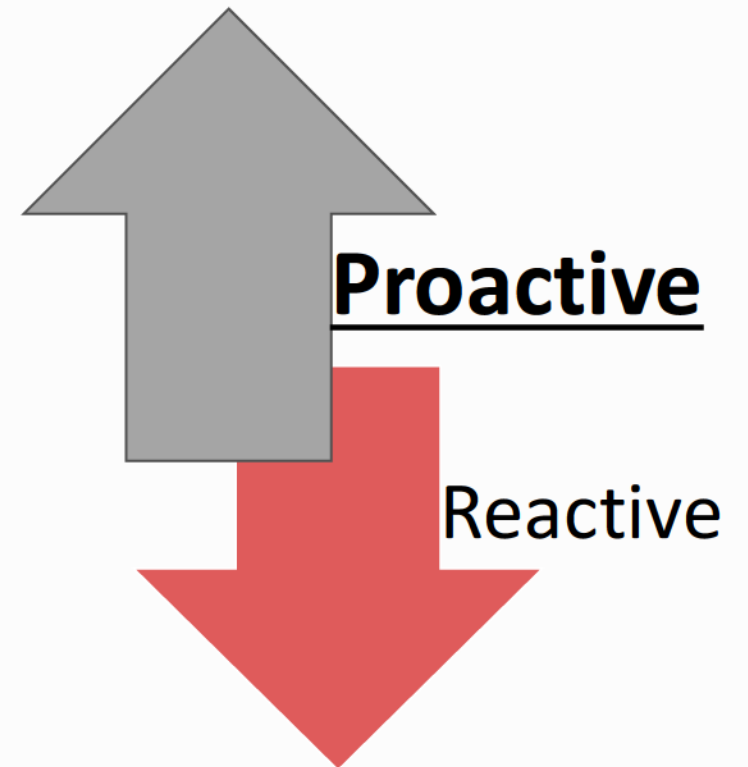
- ACL's aim is to develop the strongest and most robust network of team members and partners possible despite challenges. This includes:
 - Providing technical assistance and training;
 - Establishing clear guidelines and expectations;
 - Monitoring; and
 - Advocating for additional support when possible.
- Our goal is to provide clear guidance while also leaving enough **flexibility** to state and local partners to personalize their programs to best meet the needs of your communities.

OHIC Policies and Guidance



What is the problem?

- The policies and guidance are a proactive preparation for the future, not a reaction to any specific difficulty or liability issue within the programs or network.
- They do not indicate specific weaknesses in the programs; instead, they suggest what the program needs to do to grow and change for the future.
- Goal is to enhance quality, effectiveness, and safety.



Protecting our programs and those we serve...

As our programs' public profiles grow it becomes increasingly **necessary to ensure that the national system for managing and administering the programs is effective**, both to avoid possible problems now and to prepare for the future. This **includes** the need to manage **potential conflicts of interest**.



Risky Business

- **Position of trust** - Team members have access to the personal information and vulnerable adults
- **Complexity** of the team member role, including:
 - High knowledge requirements
 - Possibility of unintentional mistakes
 - Need for delicacy in working with beneficiaries who want simple and easy answers
- Challenge in recruiting **team members willing to put in the time** required to assimilate the information necessary to perform the role with our programs
- The need to **retain experienced team members** to avoid the high costs of recruiting and training replacements

Risk Management

- Defines expectations and rules
- Acts as guides to action and decision-making
- Ensures that OHIC program services are safer for beneficiaries, team members, and the programs
- Reduces liability exposure for programs and their partners.



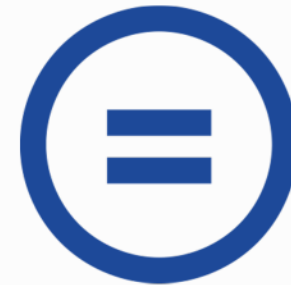
Ensuring Unbiased Service

- Our programs are all tasked to provide unbiased assistance to Medicare beneficiaries, their families, and caregivers.
- **SHIP Statute:** States must “provide assurances that staff members (including volunteer staff members) of the health insurance information, counseling, and assistance program have no conflict of interest in providing the counseling”



Being Proactive = Sound Program Management

- The Policies and Guidance are designed to:
 - Improve program quality and client service
 - Ensure continuity over time
 - Promote equity and standardization
 - Reduce risks associated with conflicts of interest



Benefits of Policies/Guidance

- The policies are a **proactive** preparation for the future
- They provide a **safety net** for beneficiaries, team members, partners, and the state program organization.
- Though this is a **national system**, the policies and guidance allow flexibility.
- Not all of the national policies are required.
- Having a solid volunteer and team member support infrastructure significantly **enhances recruitment and, importantly, retention**.
- The policies are likely to result in **increased quality, quantity, and effectiveness of program efforts** and the ability to provide services to more beneficiaries.

National Standard of Care

- Policies and guidance create a consistent set of standards throughout the SHIP, SMP, and MIPPA networks.
- Safety in numbers: National standards clarify where the bar is set, thereby limiting liability for those programs that are in compliance with national standards. That, in turn, protects the reputation and public profile of the entire network.



Partner Organizations

- Partner organizations are a very significant part of many SHIP/SMP/MIPPA service delivery systems.
- In the policies, any third-party partner organization directly engaged in the recruitment and/or management of team members performing program duties is called a “host organization”.
- Host organizations may be formally contracted to deliver program services or may do so through informal partnership arrangements with the SHIP.
- No matter the nature of the relationship, the policies and guidance apply to partners. If they are hosting team members they need to be following our guidance and policies.

Questions or worries you might have

1. “What will this cost?”
2. “All our volunteers will quit!”
3. “You can’t tell us how to run our business!”
4. “This is a lot of work!”



VRPM Overview

Volunteer Risk and Program Management Policies and Procedures

VRPM History

- Implementation Timeline:
 - 2012-2015: SMP testing and roll-out
 - April 1, 2017: SHIP implementation began
- VRPM Policies, Tools, and Materials
 - Policies found on ACL's website: <https://acl.gov/programs/senior-medicare-patrol/volunteer-risk-and-program-management-vrpm-policies>
 - Many supporting tools and materials can be found on both Center websites

VRPM Overview

Over 170 polices covering:

1. Introductory policies
2. Risk management and health and safety
3. Volunteer program management
4. Information technology
5. Key definitions

As written VRPM is focused on volunteers but are generally sound program management.

- **ACL began revamping the policies and recruited program volunteers in late 2023.**



Conflict of Interest Overview

Managing Conflicts of Interest in SHIP, SMP, and MIPPA Programs

All OHIC grant programs (SHIP, SMP, and MIPPA) are tasked to provide **unbiased assistance** to Medicare beneficiaries, their families, and caregivers.

Understanding Conflicts of Interest

- A conflict of interest is an interest that prevents, or could prevent, a person from performing some task objectively.
- SMP/SHIP/MIPPA team members must be neutral, objective, unbiased.
- Conflicts can be actual or simply the appearance of conflict.
- A conflict might exist for the team member, a family member, or a business interest connected to a potential team member.
- Most conflict questions show up during the application process, but they can occur at any time if the team member changes their situation.

The Challenging and Evolving Landscape

Medicare Advantage Initiatives:

- **Integrated Care Models** = Provide Medicare and Medicaid benefits through a single delivery system:
 - PACE, D-SNPs, Financial Alignment Initiative, etc.
- **Special Supplementation Benefits for the Chronically Ill** = Expansion of plan benefits to include items or services not typically provided:
 - Meals, Transportation, Home modifications, etc.

Business Acumen Activities:

- What is Business Acumen?
 - Definition: Keeness and quickness in dealing with and understanding a business situation in a manner that is likely to lead to a good outcome.
- AAAs and other community-based partners are financially motivated to find new sources of revenue.
- CMS policies have shifted to provide greater opportunities for aging network agencies to partner with MA plans.

Development of OHIC COI Guidance

- Developed in 2019/2020 with help from OHIC network grantees and national partners.
- Brainstormed existing and potential conflicts of interest within our networks and possible solutions to these COI.
- Identified possible new resource ideas and necessary updates to existing resources.
 - Based our initial resource ideas off of The National Long-Term Care Ombudsman Resource Center's LTCOP Organizational COI– Examples of Identification, Remedies, and Removal Local Ombudsman Entities (LOEs) (Thank you!)
- Created: COI Identification, Remedy, and Removal Resource including terminology, related policies, and decision tree.
 - Found on ACL's website: <https://acl.gov/programs/senior-medicare-patrol/managing-conflicts-interest-ship-smp-and-mippa-programs>

COI Guidance Contents

- The ACL guidance:
- Identifies the Conflict, type and category
 - Is this a conflict of loyalty, commitment, or control?
 - Is the conflict with an individual or an organization?
- Provides examples
- Identifies steps towards identification
- Provides suggestions for how to mitigate or manage risks when identifies

COI & VRPM Questions?



- ACL: OHIC@acl.hhs.gov

SHIP TA Center/SMP Resource Center:

- COI - OHICResourceCenters@nei3a.org
- VRPM – VRPM@shiptacenter.org