COPY

Self-Directed Financial Management and Counseling Services

Solicitation No.
RFP-710-22-0018

Submission Date:
June 10, 2022, 2 pm CT

ⅅ PALCO

WE SERVE PEOPLE.

Contents

Proposal Signature Page

RESPONSE SIGNATURE PAGE

Type or Print the following information.

PROSPECTIVE CONTRACTOR'S INFORMATION		
Company:	PALCO, INC	
Address:	17300 CHENAL PARKWAY, SUITE 300	
City: LITTLE ROCK	State: AR	Zip Code: 72223
Business Designation:	☐ Individual ☐ Sole Proprietorship ☐ Public Service Corp ☐ Partnership ☒ Corporation ☐ Nonprofit	
Minority and Women Owned Designation*:	☒ Not Applicable ☐ American Indian ☐ Service Disabled Veteran ☐ African American ☐ Hispanic American ☐ Women-Owned ☐ Asian American ☐ Pacific Islander American	
	AR Certification #: _____ * See *Minority and Women-Owned Business Policy*	

PROSPECTIVE CONTRACTOR CONTACT INFORMATION		
Provide contact information to be used for solicitation related matters.		
Contact Person: ALICIA PALADINO	Title:	CHIEF EXECUTIVE OFFICER
Phone: 501.604.9936, EXT. 1215	Alternate Phone:	
Email: alicia@palcofirst.com		

CONFIRMATION OF REDACTED COPY

☒ YES, a redacted copy of submission documents is enclosed.

☐ NO, a redacted copy of submission documents is not enclosed. I understand a full copy of non-redacted submission documents will be released if requested.

Note: If a redacted copy of the submission documents is not provided with Prospective Contractor's response packet, and neither box is checked, a copy of the non-redacted documents, with the exception of financial data (other than pricing), will be released in response to any request made under the Arkansas Freedom of Information Act (FOIA). See Solicitation Terms and Conditions for additional information.

ILLEGAL IMMIGRANT CONFIRMATION

By signing and submitting a response to this *Solicitation*, a Prospective Contractor agrees and certifies that they do not employ or contract with illegal immigrants and **shall not** employ or contract with illegal immigrants during the term of a contract awarded as a result of this solicitation.

ISRAEL BOYCOTT RESTRICTION CONFIRMATION

By checking the box below, a Prospective Contractor agrees and certifies that they do not boycott Israel and **shall not** boycott Israel during the term of a contract awarded as a result of this solicitation.

☒ Prospective Contractor does not and **shall not** boycott Israel.

An official authorized to bind the Prospective Contractor to a resultant contract shall sign below.

The signature below signifies agreement that any exception that conflicts with a Requirement of this *Solicitation* **may cause the Prospective Contractor's response to be rejected.**

Authorized Signature: _____ Title: CHIEF EXECUTIVE OFFICER

Printed/Typed Name: ALICIA PALADINO   Date: 5/31/2022

All Agreement and Compliance

VENDOR AGREEMENT AND COMPLIANCE

- Any requested exceptions to items in sections 1 – 4 which are <u>NON-mandatory</u> **must** be declared below or as an attachment to this page. Vendor **must** clearly explain the requested exception and should label the request to reference the specific solicitation item number to which the exception applies.

- Exceptions to Requirements **shall** cause the vendor's proposal to be disqualified.

By signature below, vendor agrees to and **shall** fully comply with all Requirements as shown in this section of the bid solicitation.

Authorized Signature: _____

Use Ink Only.

Printed/Typed Name: ___ALICIA PALADINO_____ Date: ___5/31/2022_____

Page **4** of 8

VENDOR AGREEMENT AND COMPLIANCE

- *The Contractor and/or subcontractors, shall not be direct service providers of any Medicaid services. The use of a payroll reporting agent is prohibited.*

- *The Contractor shall provide (in the space below) their current Federal Employer Identification Number (FEIN) by execution of IRS Form SS-4 Application for Employer Identification Number with IRS approval to act as the agent of the Medicaid recipient and to whom the FEIN is registered:* __05-0578399__

By signature below, vendor agrees to and **shall** fully comply with all Requirements as shown in this section of the bid solicitation.

Authorized Signature: _____

Use Ink Only.

Printed/Typed Name: __ALICIA PALADINO__   Date: ____05/31/2022____

Signed Addenda

State of Arkansas
DEPARTMENT OF HUMAN SERVICES
700 South Main Street
P.O. Box 1437 / Slot W345
Little Rock, AR 72203

ADDENDUM 1

TO: All Addressed Vendors
FROM: Office of Procurement
DATE: May 13, 2022
SUBJECT: 710-22-0018 Self-Directed Financial Management

The following change(s) to the above referenced IFB have been made as designated below:

___X___ Change of specification(s)
___X___ Additional specification(s)
_____ Change of bid opening date and time
_____ Cancellation of bid
___X___ Other

OTHER

Page 6, Section 1.8.C.1.d – remove

Page 10, Section 1.20.D.3 - remove

ADDITIONAL SPECIFICATIONS

Page 16, Section 2.5.2.B.5 – Add the following:
Orientation and training may begin as early as forty-five (45) calendar days prior to Go-Live but must be completed no later than seven (7) calendar days before Go-Live.

CHANGE OF SPECIFICATIONS

Page 15, Section 2.3.B – Replace with the following:
Prospective Contractor and subcontractor must have at least two (2) years of experience within the last five (5) years providing the Fiscal Employer Agent model of financial management and counseling services to a population of over three thousand (3,000) Beneficiaries. Performed duties are set forth in Revenue Procedure 70-6 IRS Notice 2003-70 and identified as a designated agent under section 3504 (Acts to be Performed by Agents). With bid submission for verification purposes, Contractor and subcontractor shall provide evidence of experience including, at minimum, a detailed narrative describing experience, letter(s) of recommendation, and two (2) references with contact information.

Page 18, 2.5.4.1 – Replace with the following:
Leadership Team – Oversees the development and the structure needed to fulfill the contract. Members of the team must have the following: • Bachelor's degree • Minimum of five (5) years of experience in Medicaid or Financial Management services • Experience with the transition from one (1) FMS agent to another

Page 39, Section 2.5.19B – Replace with the following:

Contractor's information system must be configurable to interface with the Arkansas Medicaid Management System (MMIS) per Attachment M – Arkansas Medicaid Vendor File Exchange specifications. There is no Prior Authorization request for self-direction. Arkansas self-directed budgets are established to pay out through MMIS monthly, based on the number of days in a month and a Beneficiary/Employer's budget allowance.

The specifications by virtue of this addendum become a permanent addition to the above referenced IFB. Failure to return this signed addendum may result in rejection of your proposal.
If you have any questions, please contact: Buyer's name, Buyer's email address and phone number.

_____   5/19/2022
Vendor Signature   Date
                    Palco, Inc.
_____
Company

State of Arkansas
DEPARTMENT OF HUMAN SERVICES
700 South Main Street
P.O. Box 1437 / Slot W345
Little Rock, AR 72203

ADDENDUM 2

TO: All Addressed Vendors
FROM: Office of Procurement
DATE: May 18, 2022
SUBJECT: 710-22-0018 Self-Directed Financial Management

The following change(s) to the above referenced IFB have been made as designated below:

_____ Change of specification(s)
_____ Additional specification(s)
_____ Change of bid opening date and time
_____ Cancellation of bid
__X__ Other

OTHER

Add the revised Official Bid Price Sheet to include updated formulas for calculations.

The specifications by virtue of this addendum become a permanent addition to the above referenced IFB. Failure to return this signed addendum may result in rejection of your proposal.

If you have any questions, please contact: Buyer's name, Buyer's email address and phone number.

_____   5/24/2022
Vendor Signature   Date

_____ Palco, Inc. _____
Company

State of Arkansas
DEPARTMENT OF HUMAN SERVICES
700 South Main Street
P.O. Box 1437 / Slot W345
Little Rock, AR 72203

ADDENDUM 3

TO: All Addressed Vendors
FROM: Office of Procurement
DATE: May 31, 2022
SUBJECT: 710-22-0018 Self-Directed Financial Management

The following change(s) to the above referenced IFB have been made as designated below:

_____Change of specification(s)
_____Additional specification(s)
___X___ Change of bid opening date and time
_____Cancellation of bid
___X___ Other

CHANGE OF BID OPENING DATE AND TIME

Bid submission date has changed to June 10, 2022, at 1:00 CST.
Bid opening date has changed to June 10, 2022, at 2:00 CST.

Added revised price sheet.

The specifications by virtue of this addendum become a permanent addition to the above referenced IFB. Failure to return this signed addendum may result in rejection of your proposal.

If you have any questions, please contact: Buyer's name, Buyer's email address and phone number.

_____ -   ___5/31/2022_____
Vendor Signature   Date

_____Palco, Inc._____
Company

Contract Grant and Disclosure

Contract Number _____
Attachment Number _____
Action Number _____

CONTRACT AND GRANT DISCLOSURE AND CERTIFICATION FORM

Failure to complete all of the following information may result in a delay in obtaining a contract, lease, purchase agreement, or grant award with any Arkansas State Agency.

SUBCONTRACTOR: ☐ Yes ☑ No   **SUBCONTRACTOR NAME:**

TAXPAYER ID NAME: PALCO INC   **IS THIS FOR:** Goods? ☐ Services? ☑ Both? ☐

YOUR LAST NAME: _____ **FIRST NAME** _____ **M.I.:** _____

ADDRESS:

CITY: _____ **STATE:** _____ **ZIP CODE:** _____ **COUNTRY:** _____

AS A CONDITION OF OBTAINING, EXTENDING, AMENDING, OR RENEWING A CONTRACT, LEASE, PURCHASE AGREEMENT, OR GRANT AWARD WITH ANY ARKANSAS STATE AGENCY, THE FOLLOWING INFORMATION MUST BE DISCLOSED:

FOR INDIVIDUALS *

Indicate below if: you, your spouse or the brother, sister, parent, or child of you or your spouse is a current or former: member of the General Assembly, Constitutional Officer, State Board or Commission Member, or State Employee:

Position Held	Mark (√)		Name of Position of Job Held [senator, representative, name of board/ commission, data entry, etc.]	For How Long?		What is the person(s) name and how are they related to you? [i.e., Jane Q. Public, spouse, John Q. Public, Jr., child, etc.]	
	Current	Former		From MM/YY	To MM/YY	Person's Name(s)	Relation
General Assembly							
Constitutional Officer							
State Board or Commission Member							
State Employee							

☐ None of the above applies

FOR AN ENTITY (BUSINESS) *

Indicate below if any of the following persons, current or former, hold any position of control or hold any ownership interest of 10% or greater in the entity: member of the General Assembly, Constitutional Officer, State Board or Commission Member, State Employee, or the spouse, brother, sister, parent, or child of a member of the General Assembly, Constitutional Officer, State Board or Commission Member, or State Employee. Position of control means the power to direct the purchasing policies or influence the management of the entity.

Position Held	Mark (√)		Name of Position of Job Held [senator, representative, name of board/commission, data entry, etc.]	For How Long?		What is the person(s) name and what is his/her % of ownership interest and/or what is his/her position of control?		
	Current	Former		From MM/YY	To MM/YY	Person's Name(s)	Ownership Interest (%)	Position of Control
General Assembly								
Constitutional Officer								
State Board or Commission Member								
State Employee								

☒ None of the above applies

DHS Revision 11/06/2014

Contract Number _____
Attachment Number _____
Action Number _____   **Contract and Grant Disclosure and Certification Form**

Failure to make any disclosure required by Governor's Executive Order 98-04, or any violation of any rule, regulation, or policy adopted pursuant to that Order, shall be a material breach of the terms of this contract. Any contractor, whether an individual or entity, who fails to make the required disclosure or who violates any rule, regulation, or policy shall be subject to all legal remedies available to the agency.

As an additional condition of obtaining, extending, amending, or renewing a contract with a *state agency* I agree as follows:

1. Prior to entering into any agreement with any subcontractor, prior or subsequent to the contract date, I will require the subcontractor to complete a CONTRACT AND GRANT DISCLOSURE AND CERTIFICATION FORM. Subcontractor shall mean any person or entity with whom I enter an agreement whereby I assign or otherwise delegate to the person or entity, for consideration, all, or any part, of the performance required of me under the terms of my contract with the state agency.

2. I will include the following language as a part of any agreement with a subcontractor:

   Failure to make any disclosure required by Governor's Executive Order 98-04, or any violation of any rule, regulation, or policy adopted pursuant to that Order, shall be a material breach of the terms of this subcontract. The party who fails to make the required disclosure or who violates any rule, regulation, or policy shall be subject to all legal remedies available to the contractor.

3. No later than ten (10) days after entering into any agreement with a subcontractor, whether prior or subsequent to the contract date, I will mail a copy of the CONTRACT AND GRANT DISCLOSURE AND CERTIFICATION FORM completed by the subcontractor and a statement containing the dollar amount of the subcontract to the state agency.

I certify under penalty of perjury, to the best of my knowledge and belief, all of the above information is true and correct and that I agree to the subcontractor disclosure conditions stated herein.

Signature _____ Title __CHIEF EXECUTIVE OFFICER__ Date _5/31/2022_

Vendor Contact Person __ALICIA PALADINO__ Title __CHIEF EXECUTIVE OFFICER__ Phone No. _501.604.9936, ext 1215_

Agency use only

Agency Number	Agency Name	Agency Contact Person	Contact Phone No.	Contract or Grant No.
0710	Department of Human Services			

DHS Revision 11/05/2014

Equal Opportunity Policy

PO Box 242930
Little Rock, AR 72223
Toll Free 866.710.0456
Online: PalcoFirst.com

Equal Employment Opportunity Policy

Palco, Inc. is equal opportunity employer. It is Palco, Inc.'s policy to assure that employees, employee applicants, and clientele are not discriminated against because of race, color, gender, national origin, religion, age, disability, marital status, sexual orientation, or veteran status. It is Palco, Inc.'s policy to comply in all respects with the Civil Rights Act of 1964, Executive Orders 11246, 11375, and 11625, the Equal Pay Act of 1963, the Age Discrimination Act of 1967, the Vocational Rehabilitation Act of 1973, the Veterans Readjustment Assistance Act of 1974 and all regulations issued there under.

Equal employment opportunity principles govern all aspects of Palco Inc.'s personnel policies, business practices, and operations. All phases of employment, including recruitment, hiring, evaluation, promotion, discharge, wages and other compensation, benefits, job training, and classification, shall be conducted in compliance with equal employment opportunity laws and regulations.

Proposed Subcontractors

Palco does not propose any sub-contractors for this RFP.

Other Documents

CERTIFICATE OF GOOD STANDING WITH THE STATE OF AR

Arkansas Secretary of State
John Thurston

State Capitol Building ♦ Little Rock, Arkansas 72201-1094 ♦ 501-682-3409

Certificate of Good Standing

I, John Thurston, Secretary of State of the State of Arkansas, and as such, keeper of the records of domestic and foreign corporations, do hereby certify that the records of this office show

PALCO, INC.

authorized to transact business in the State of Arkansas as a For Profit Corporation, filed Articles of Incorporation in this office July 21, 2003.

Our records reflect that said entity, having complied with all statutory requirements in the State of Arkansas, is qualified to transact business in this State.

In Testimony Whereof, I have hereunto set my hand and affixed my official Seal. Done at my office in the City of Little Rock, this 10th day of March 2022.

John Thurston
John Thurston
Secretary of State

Online Certificate Authorization Code: bc9bdb5db1e39c7
To verify the Authorization Code, visit sos.arkansas.gov

VOLUNTARY PRODUCT ACCESSIBILITY TEMPLATE (VPAT)

Our WCAG 2.1 compliant PalcoFirst.com website provides critical communications, trainings, and forms. For urgent communications we provide a link on the Palco homepage to an expanded newsfeed article explaining the detail, actions required (if applicable) and contact information.

Palco is in full compliance with standards and protocols adopted by the Secretary under sections 1104 and 1561 of the Affordable Care Act. All web-based applications employ security certificates and encryption protection, and our website and software solutions (Intake, Connect, and CMP) are 508-compliant.

At Palco, we recognize the importance of easy-to-use, user-centric websites and software applications, especially for elderly, physically disabled or intellectually disabled users. Accordingly, we have committed ourselves to the following features and principles.
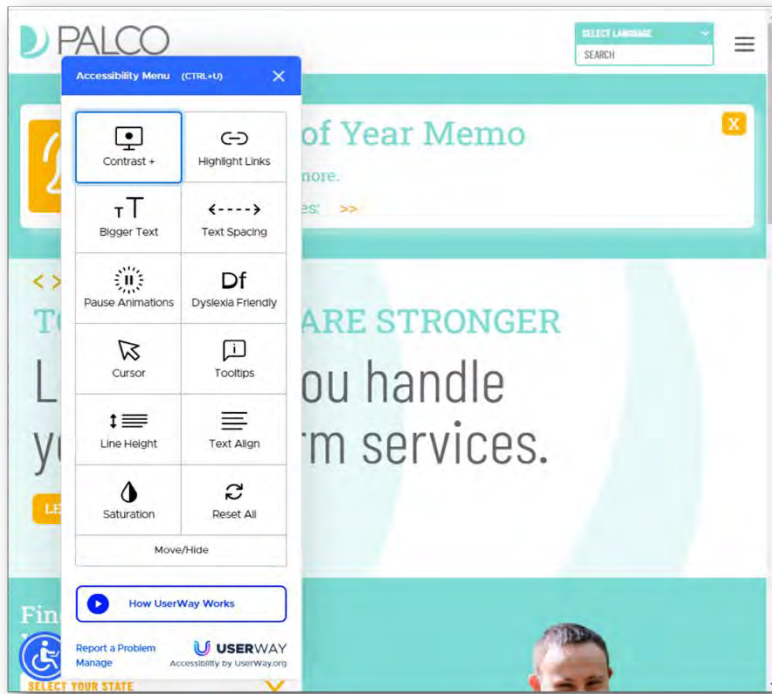
With a few clicks, visitors may change the visual characteristics of a web page: contrast, hyperlink visibility, text size, text spacing, and many other attributes to better read and understand the webpage contents.

With this in mind we provide equivalent access as provided in Arkansas Code Annotated § 25-26-201 et seq., as amended by Act 308 of 2013, if equivalent access is not reasonably available, then individuals who are blind or visually impaired shall be provided a reasonable accommodation as defined in 42 U.S.C. § 12111(9), as it existed on January 1, 2013.

See **Appendix 13** for Palco's full VPAT assessment.

Executive Summary

YOUR TRUSTED PARTNER YESTERDAY, TODAY, AND TOMORROW.

MEETING YOUR SELF-DIRECTED PROGRAM GOALS REMAINS OUR PRIMARY MISSION.
We are proud to have longevity with the Arkansas Department of Human Services. This collaborative partnership is built upon a mutually respectful relationship, collective institutional knowledge, advancement of technology and architecture, and tag-teaming the ever-diverse dimensions of the self-directed services and supports evolution.

As Arkansas' designated FMS and Counseling Services vendor, we work hard to make it easy for DHS and your program participants. Our commitment to the State is backed by our historic record of unparalleled customer service, absolute focus on delivering Financial Management Services (FMS) and Counseling supports, sophisticated cloud-based technical solutions, and accurate payroll processing.

Figure 1: Palco works across the country

Our company headquarters remain in Arkansas, the one of the first states to pilot "self-direction" more than 20 years ago. You could say Arkansas, Self-Direction, and Palco have remained industry partners from the beginning.
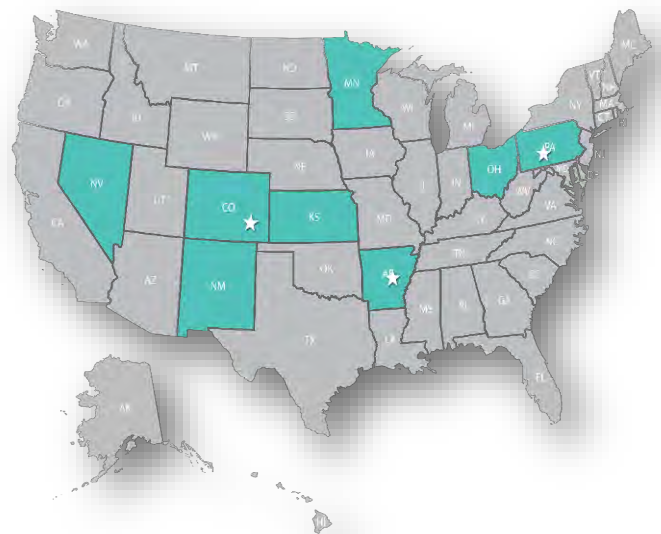
Palco was built out of a CPA firm, who helped author the book on self-direction. Today, we provide a variety of self-directed services to diverse populations across eight states. Through our growth, we remain committed to our home state and our fundamental mission to provide the best FMS services and Counseling support to aid individuals and their families to thrive at home and in their communities. See **Figure 1** for Palco partner states.

Palco is rooted in the Arkansas landscape by history, commitment, and choice. In a world that is changing faster than ever, our purpose to support individuals and their families, to thrive at home and in their community acts as our North Star.

We never forget it even through the inevitable challenges. In fact, it aids in our determination to find solutions which go beyond our client's expectations, strengthen our ability to provide quality jobs in Arkansas, and develop lasting relationships that withstand the test of time.

OUR APPROACH

We deliver services based on our extensive dedication and experience in the FMS field, knowledge of self-direction, tailored solutions, and excellent customer service. Our services meet three core principles:

Customer Experience is our key to success. Our mission is to have a positive impact on society. We want to help individuals overcome all barriers to living their most meaningful lives. We value our role in helping these individuals live in the community—and we do everything we can to support them, including offering personalized support through a person-centered call center that has *proven* metrics of satisfaction. Our vigorous quality assurance measures include a weekly review of call statistics, staff performance, satisfaction surveys, and performance reports. We also know that our partners value information at their fingertips. Our systems have built-in alerts and notifications that keep us informed in real time of key tasks. We've invested heavily in our system architecture and user interface to provide valuable program information and metrics at a glance – with room to grow and meet the needs of the future.

A company culture built on integrity and innovation. Palco's ownership is 100% CPA owned. Palco was one of the first companies in the country to provide FMS services and we established industry standards. As tax professionals, we have access to periodicals and tax trainings that our competitors do not. We remain current on all IRS, state, and federal changes that impact this industry because FMS is what we do. We look for CPAs and experienced accountants to form our FMS team because we know experience in accounting and tax is what makes an FMS trustworthy. As CPAs, it is expected of our profession to provide integrity in budgetary tracking and to understand complex tax laws – all while remaining flexible to the ongoing industry changes. Our executive leadership and management are comprised of individuals with compassion for people and the business expertise which takes them to the top of their fields. We take great care to hire top talent. This has resulted in a team with impressive backgrounds in accounting, information technology, software development, customer service, health policy, case management, human resources, communications and more. Because of this commitment our reputation is one based on trust and integrity.

PALCO MISSION

We serve people.

We provide the Services that aid individuals to live independent lives, where they are empowered to make their own choices about what's best for them.

Palco champions diversity of thought and the promise of new ideas, honed by experience and enhanced by technology.

OUR CORE VALUES
Accountability
Professionalism
Expertise
Trust
Responsiveness
Courage
Respect
Leadership

Cutting-edge technologies. Technology is at the heart of everything we do. We constantly embrace innovative technology to create efficiencies and update our processes. Our software solutions are tailored to this industry and are easily customized to meet state and programmatic requirements. Our business intelligence system is the only one of its kind in our service sector. We provide self-service tools for individuals, but we also give people options. We work hard to streamline processes for program participants and their employees—however, we never put efficiency over empathy. We know not everyone has the same capacity or ability to access online tools.

Conceptualization, creation, and skillful implementation of technology to accomplish contract outcomes are our strengths. As our most valued partner we trust our demonstrated capabilities has impacted Arkansas programs to run efficiently and cost-effectively. We are most proud of that—because it takes a team to create efficiency. It stems from collaboration, communication, great planning, and people working toward a common goal.

We easily adapt to changes in federal and state tax, labor, and program rules and requirements, including IRS changes in reporting, forms, and procedures; federal and state Department of Labor overtime and wage reporting changes; changes in state workers' compensation insurance rules; and state self-directed services program policies and procedures. With each challenge that we have faced, we have provided quality VF/EA FMS (Financial Management Service) and related support at vast cost savings, while we further honed our expertise in the provision of self-directed services.

In short, our expertise and impeccable reputation in the provision of VF/EA FMS has allowed us to expand our operations to self-directed service programs nationwide. **We have more than a decade of providing FMS services and supports to over 3,000 program participants.** Currently, we provide FMS and information and assistance support to multiple programs in eight states, delivering an array of services which includes the following:

- Vendor Fiscal/Employer Agent (VF/EA)
- Financial Management Services (FMS)
- Counseling Support for self-directed services
- Case Management
- Medicaid and Veterans Health Administration Billing and Claims Processing
- In-house self-direction software solutions
- Customer Support Center (call center)
- Reporting
- Payroll and Tax Filings
- Employer Orientation and Skills Training

TRUSTING PARTNERSHIPS

Palco is a company founded on purpose and accountability. The Palco leadership team has been privileged to play a role in helping thousands of people across the country exercise choice in their in-home care. As self-directed services have grown, we have grown along with it. We credit our strength

and endurance to a consistent approach to managing our business and our people's character and the people we serve.

Annual satisfaction surveys demonstrate 98% satisfaction, with most **respondents giving Palco a 100% performance rating across the board** for customer service, accuracy in payroll processing, and responsiveness.

We appreciate the opportunity to create and maintain a trusting partnership with Arkansas, particularly to enhance the delivery of services to the participant with respect to person-centered planning, communication, reporting and analytics, and instituting innovative measures to deter the risks of participant abuse and Medicaid fraud. The agencies that we work with have consistently praised us for our professionalism, diligence, and integrity, and have routinely awarded us new business. We take an innovative approach to each program, ensuring that we provide a complete solution to meet the needs of stakeholders. As attested by our successful partnership across the country we have provided letters of recommendation and Letters of Reference.

Our enduring partnership in Arkansas has been a pleasure. Our workflow and technology structure are uniquely positioned to eliminate implementation obstacles, improve DHS' Return on Investment in time savings and financial expenditure and decrease the anxiety and stress level of the Participants/Representatives and their Employees supported through this program. Equally as important is working with a trusted partner who will continue to pursue the vision of self-direction for the Arkansas Department of Human Services with a shared dedication to improving the quality of life of all Arkansans by protecting the vulnerable, fostering independence, and promoting better health.

WE SERVE PEOPLE.
Understanding the needs of the participants we serve is our primary mission. From there, our honed efficiencies help them to remain in their homes and communities. We work hard to make a complicated system easy for DHS and the program participants.

We deliver services based on our extensive dedication and innovation in the FMS and Counseling field, knowledge of self-direction, tailored solutions, and excellent customer support. Our services enhance opportunities for self-directing participants and manage FMS and Counseling services and supports in a fiscally and programmatically effective and efficient manner.

Throughout the following sections, we will demonstrate our solutions to meet or exceed the State's requirements for FMS and Counseling services and supports. Palco's Case Management Portal (CMP) is a keystone of our service delivery, which serves as the repository of all program participant-related data and program business rules.

As the only FMS with their foundation as Certified Public Accountants, Palco has routinely demonstrated its ability to provide excellent self-directed services, and our record substantiates that commitment. As a company led by CPAs, our services meet the precision, transparency, and

accountability expected of our field through a quality assurance program. As tax professionals, we have access to periodicals and tax trainings that our competitors do not. We remain current on all IRS, state, and federal changes that impact this industry because FMS is what we do. We look for CPAs and experienced accountants to form our FMS teams because we know experience in accounting and tax is what makes an FMS trustworthy. As CPAs, it is expected of our profession to provide integrity in budgetary tracking and to understand complex tax laws – all while remaining flexible for the ongoing industry changes.

Palco has extensive experience providing supports (Financial Management Services [FMS], Counseling Services, and Information and Assistance) that facilitate the use of self-directed services. Palco has provided this support to a diverse group of individuals with disabilities and chronic conditions including older adults aged 60 and older, adults with physical, intellectual, and developmental disabilities, children with autism, veterans, and their families.

Palco currently supports over 2,300 participants in the DHS-administered self-direction program and looks forward to serving participants in other DHS waiver programs moving forward. As participation in self-directed services has fluctuated in recent years, we have demonstrated our ability to easily handle all volumes. During the height of the COVID pandemic, we pivoted our resources to accommodate the safety of all stakeholders while also maintaining our standard processes and procedures for enrollment, payroll, and customer support. Our Counseling staff shifted their focus to frequent participant check-ins, up to three (3) days per week in the early weeks of the COVID pandemic. DHS implemented a safety protocol that we incorporated into our frequent check-ins, ensuring program participants had their basic needs met – food, shelter, etc. We tracked these calls and reported back to the state for follow-up as necessary.

E.1. Transition, Project Organization & Management

Per the evaluation criteria, Palco has included a sample MOU on page 27, our approach to Employee Compliance tracking on page 28, and our approach to developing and maintaining Emergency Backup Plans for program participants on page 29.

We recognize the success of our partners in their fiscal responsibility and public opinion surrounding implementation, transition, and delivery of program requirements. DHS' success is also the key to Palco's success. We have thoughtfully worked to deepen our relationship with the Arkansas Department of Human Services (DHS), Division of Provider Services and Quality Assurance (DPSQA) to support the inevitable evolution of the needs of all stakeholders. We continue to provide the same customer service DHS has come to know and expect from Palco's team.

As the incumbent, Palco believes we offer DHS the best quality and value in FMS and Counseling Services. Our implicit differentiation in our project management approach, qualified managers and staff, in-house software systems, existing integration with the States EVV solution, and customer support capabilities make Palco the ideal choice to support the expansion of self-direction in Arkansas. It would take months for another FMS and Counseling Services vendor to attempt to replicate Palco's capabilities and relationships. If awarded this contract, Palco will continue serving members of existing programs while adapting systems and processes to support new programs offering self-direction without delays or disruption in services typically associated with a transition to a new vendor.

Transitions can be challenging. The State will benefit strategically from an incumbent vendor who has all the people, processes, and systems in place to continue providing quality services to existing program participants while collaborating with the State to onboard new waiver programs, as applicable. We have extensive knowledge of Arkansas' self-direction program and maintain meaningful working relationships with many key stakeholders within the State. We will aggressively work to apply and leverage these resources and relationships, while developing and applying new ones, to incorporate new program participants and services into our service delivery.

To borrow an analogy from the climbing community: We've already climbed this mountain together, we've invested in the preparation and extended the energy in the ascent, and we are now enjoying the view from the summit. Our partnership has proven successful and continues to focus on what's next and ask ourselves how we can offer more to program participants and their employees.

TRANSITIONS AND ONBOARDING

As the self-direction program grows, or in the event new waiver programs are included, we would prefer to meet with DHS and DPSQA teams to confirm program requirements, including any policies, regulations, or program standards related to the delivery of FMS or Counseling Services for new participants or new waiver programs.

During any transition phase, program participants are assigned a Palco Counselor to assist with transition activities and provide individualized support and assistance, as needed. During the height

of the COVID pandemic, we partnered closely with the Arkansas Department of Human Services and FDGS to transition 2,842 program Participants/Representatives and 3,559 self-directing Employees to a service delivery model that included Electronic Visit Verification. As part of this transition, Palco's dedicated training team and Counseling field-staff led the EVV implementation training efforts by providing virtual, instructor-led group training opportunities for stakeholders. In addition, our Counseling field staff, and Customer Support staff participated in hundreds, if not thousands, of individual support calls with program participants during this transition to EVV.

Implementing EVV with a self-direction population requires patience, intensive training efforts, and exemplary customer support. Our Customer Support Center fielded 50,737 calls over the course of six months, helping to ease anxiety and the fear of change experienced by many participants and their employees. Our collective efforts alongside DHS staff enabled the State to implement EVV as seamlessly as possible.

In recent years we have transitioned programs in states where we were awarded new business. We approach these transitions with a sound transition and training plan, often transitioning these self-direction stakeholders in a compressed period of time. In late 2020, we worked with the State of New Mexico to transition FMS services for three distinct self-direction programs serving over 3,100 participants and 4,400 workers in a period of seven (7) short weeks, and this included the introduction of EVV for these programs.

In early 2021, an FMS vendor abruptly left the State of Colorado and we stepped up to transition the participants and workers served by that vendor in just three months' time. We worked closely with the exiting vendor and State program staff to transition historical program data, performing multiple quality reviews to ensure accuracy for payroll, budget, and tax reporting purposes. This transition created a bifurcated tax year for the transitioning self-directing workers, and our knowledgeable accounting and tax staff handled the end of year reporting requirements with ease.

We are currently undergoing a transition in Ohio, a recently awarded program, and are working with the exiting vendor and program staff to ensure a smooth transition and onboarding process for program participants and their self-directing workers. Ahead of the transition date, we have begun enrolling new program participants and their workers using our web-based enrollment software to allow the program to continue to grow without service disruption or enrollment delays while we work on transitioning existing participants and workers.

During transitions we work closely with the exiting vendor, train our internal enrollment, customer support, payroll, and billing staff on the policies and programmatic requirements of the new program, and develop training and communication materials to support the transitioning participants and their workers. We work closely with our State or MCO partners to ensure our systems are ready for data transfers and file transmissions, working towards an integrated solution between our systems. We develop a transition plan including a detailed timeline, perform readiness reviews, and hold frequent internal and external planning meetings to engage all stakeholders in the implementation process.

Our transition plan and implementation approach includes all requirements as outlined in Section 2.5.2 of this RFP (710-22-0018), and our software solutions meet the requirements outlined in Section 2.5.3 of this RFP.

Palco respects that DHS staff are the subject matter experts on your program, and we appreciate that guidance. Palco's implementation team schedules an introductory kick off meeting to introduce ourselves to the program and contract staff as well as identify a project manager on both sides that will help coordinate meetings, document action items, and perform follow-up to ensure project deliverables are met on time and as expected. Moving forward we will schedule a series of requirement gathering sessions with pertinent state program staff. Our process is described below in **Figure 2**.

Figure 2: Transition and Implementation

Our implementation framework is built from years of successful transitions. We identify the FMS program details and Counseling supports through individual sessions on the following topics:
- Program Setup
- Enrollment
- Budget Configuration
- EVV
- Payment Validations
- Billing and Eligibility
- Notifications
- System Access
- Reports

We leave each session with a better understanding of the experience DHS program staff want for each type of user as well as documented program requirements and specifications that meet your exact goals. Once all stakeholders have agreed to these written requirements, we translate these goals and requirements into Palco's applications for online enrollment (Intake), electronic timesheet processing (Connect), payroll, and customer support.

To further aid with project success, we will cross-reference our understanding with yours with respect to DHS' data interfaces and the operational aspects of the state's interchange (MMIS) system and the state EVV system to include concurrent usage, transaction volumes, etc.

While program specifications, project planning and launch timelines follow a standard waterfall methodology, Palco internally leverages Agile development principles, emphasizing individuals and interactions, working products, customer collaboration, and responding to change above other values.

PROJECT ORGANIZATION AND MANAGEMENT

It is with all our self-direction partners in mind, that Palco has built our cloud-native technology solution with an eye toward refining communication to customers, fine tuning the processes that streamline deliverables, decreasing errors, and increasing the efficiency of doing business. We know that the best work evolves from listening to our clients and having the established discipline to define the solution. **Palco understands that Arkansas and DHS stakeholders want a swift enrollment process, centralized budget repository, a user-friendly timesheet submission and processing portal, and a dependable payroll process.** As this section demonstrates, our system architecture enables compliance-based performance. Our solution does not require any software installation at user sites. We continually load-test to ensure we can handle volume with no downtime.

In short – our systems are designed for the implementation and growth – of any size program.

WEB-BASED SOLUTION

Palco's Case Management Portal ® **(CMP) is one reason we are the best FMS/Counseling Services partner in the sector.** Palco's customizable cloud-based CMP is constructed from the backbone of 23 years of providing FMS to the self-directed population. Our software solutions are tailored to this industry, and even more so tailored to the specifications of the Arkansas DHS *IndependentChoices* program. **Our CMP streamlines budget, payroll, and claims processing as well as ties in data from other external-facing Palco applications: Intake** ® **(enrollment) and Connect** ® **(time entry), in one easy-access tool**.

Our cloud-based system is built to make a complicated system simple with real-time reporting, dashboards, and 24/7 access. Features include:

- Cloud-based FMS system with real-time reporting, dashboards, and 24/7 secure, remote access
- Near-zero downtime (for system maintenance)

- ☑ Integrated with the state's chosen EVV vendor system for Provider time entry
- ☑ Ability to apply different SUTA rates for each Provider, supporting individual tax rates
- ☑ Ability to support various budget allocation logic – Monthly, Daily, Annual
- ☑ Ability to run frequent Medicaid eligibility checks on all participants (active and inactive)
- ☑ Reporting features
  - o Ability to view paid and denied timesheets, and reasons for denial
  - o Ability to view budget utilization by participant
  - o Ability to view historical (worker) payment details, including paystubs

Our Case Management Portal (CMP) provides a comprehensive beginning-to-end detailed view of case information. It is a significant part of the Palco solution, and we believe a brief introduction to the CMP suite will provide a preliminary understanding to build upon throughout the rest of Palco's response.

The cloud-native Palco Case Management Portal serves as the multi-tenant repository for all program participant-related data and program business rules. It contains various modules for case management (records, member info), accounting (utilization, pay ledger/history, repository of pay rates and employer cost rates, exemptions, tax rates, Workers' comp, budgets), billing, enrollment, time entry, and reporting. See **Figure 3**.

Figure 3: Palco's Case Management Portal

Palco's CMP provides administrative transparency and immediate access to data from other external-facing Palco applications including Connect (time entry) and Intake (enrollment). **We have the capability to map user roles and permissions so that each user role (state program staff, Palco Counselors, DHS nurses, etc.) has a unique permission set giving them access to the information necessary to best support the self-direction programs in an efficient and successful manner.**

Technology has challenged Palco developers to provide cloud-based software with continuous delivery and an eye towards the user experience, as well as solutions that are configurable with the ability to meet increased demand (scalability). Palco and key leaders in Arkansas have collaborated to identify solutions that benefit all users. Because self-direction continues to evolve, we will continue to work with DHS leaders to define new program expectations and ensure our software solutions meet the demand.

State Benefits:

- ✔ Secure, remote on-demand access to information
- ✔ Credentialing for tailored access/permissions for staff at many levels
- ✔ On-demand analysis and reporting
- ✔ Dashboard views of trends and data
- ✔ Enter referrals and budget Service Authorizations directly into CMP (eliminate manual process, i.e., spreadsheets)
- ✔ Service Authorization and Billing Management and Support

Self-Direction Participant/Representative and Employee Benefits:

- ✔ Online / Electronic Enrollments
- ✔ Ability to complete all Palco and government forms online
- ✔ Time entry and approvals
- ✔ Integration with EVV
- ✔ Visibility on budget utilization for employers
- ✔ On-demand access to paystubs
- ✔ Visibility on paid and denied timesheets, reasons for denial

With Palco as your partner, our Case Management Portal (CMP) will remain accessible to DHS program staff and Palco Counselors and can be enhanced and extended to other DHS identified users (like DHS Nurses), as needed.

Our focus is on your self-directing program participants. We understand the public fiduciary responsibility we are all tasked with, and we take it seriously. Along with providing a portal built with exceptional user experience at the forefront, our goal is to provide a barrier-free, no hassle experience enhancing the business relationship.

Palco's Case Management Portal (CMP) provides a detailed view of a participant's journey from enrollment to monthly budget management – and so much more. Users attain dynamic case handling tools for real-time contextual case management access and processing information.

Every program has unique requirements. New modules within our CMP are configurable. For example, in Arkansas, our CMP system is configured to house Arkansas program-specific data like waiver type and provider identification numbers for every individual self-directing employee. We are also integrated with several State specific systems such as the State MMIS system for receiving budget funds and the State Electronic Visit Verification (EVV) solution for in ingesting of time captured data.

We strive to make our software products as accessible as possible. Our self-direction software solutions are accessible and operable on standard hardware operating systems and browsers, with no need for on-site user installation.

CMP Enhancements for Arkansas self-direction program(s)

As Palco and the State of Arkansas embark on the next phase of our long-standing partnership, we look forward to continuing development and rolling out new features of our Case Management Portal (CMP) to benefit the DHS self-direction programs. New features we look forward to discussing with DHS program staff and your extended stakeholders include:

- ❤ Role-mapped permissions for DHS nurses and other support staff
- ❤ On-demand reporting and real-time dashboards
- ❤ Integration of the Arkansas Task and Hours Guide with our CMP Budgeting tool
- ❤ Integration of employment clearance registry checks and criminal background checks with our CMP system
- ❤ Integration of real-time participant eligibility checks via a 270/271 process with interChange (MMIS)
- ❤ In-depth needs and goals assessments for program participants, delivered by their dedicated Palco Counselor
- ❤ Integration of activity codes captured in AuthentiCare, providing service documentation at the timesheet shift level

Enrollment Made Easy

Intake is Palco's online program enrollment platform. Intake makes program enrollment and transition extremely easy. Users enter their data online, and this pre-populates forms that are signed digitally. As the forms are completed, the home screen reflects their percentage completion in real-time.

Over the past 20 years, we have streamlined the enrollment process by simplifying our documents as much as possible, requiring only the necessary information to appropriately render VF/EA services, and remain compliant with program, state, and federal requirements. Palco is the only VF/EA partner with a fully online enrollment system that allows Participants/Designated Employers and their Workers the opportunity to sign all required forms online and enroll via a completely paperless process. Palco's CMP Intake®[1] advantages are shown in **Figure 4**.

Figure 4: CMP Intake Advantages
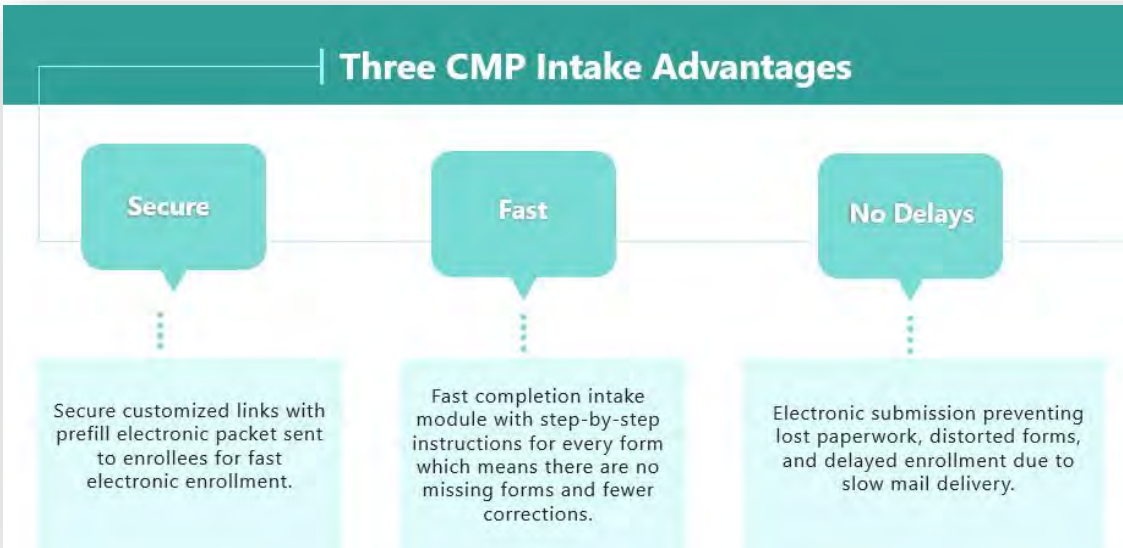
Our Enrollment team is composed of compassionate point of entry professionals with seasoned assessment skills, a thorough understanding of the DHS DPSQA pre-screening and referral process, and an in-depth knowledge of Palco's Intake and Case Management Portal (CMP). As your incumbent, we have enrollment packets for both Participants/Representatives (Employers) and Employees tailored to *IndependentChoices* program rules. In recent years, we have made changes to these enrollment packets to accommodate new program requirements like EVV and enrolling the self-directed Worker as an Arkansas Medicaid provider by requesting an NPI from the Arkansas Medicaid program. We look forward to reviewing the current enrollment packets with DHS program staff to ensure they continue to meet your needs now and into the future.

We have customized our user-friendly *Employer Packet* and *Employee Packet* to contain all forms and information required under this program. Our goal is to reduce enrollment wait times and make the transition to self-direction as smooth as possible. We prepopulate all packets to the extent possible to reduce the fields that families must complete, and we offer a variety of solutions for completing packets. New packets and incoming Participants/Representatives will be provided pre-populated

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[1] CMP Intake is the enrollment platform used to generate packets, track enrollments, and allows external enrollees to digitally complete their paperwork and packets online.

Enrollment packets within two (2) business days of the referral to the Arkansas self-direction program. All enrollment packets are also available on the program page at www.PalcoFirst.com.

CMP CONNECT® SECURE WEB PORTAL

Connect® is Palco's web-based time entry system. Users enter their timesheets online via this portal. Connect is also linked to the state's chosen EVV solution, AuthentiCare, via an automated job system that allows EVV visits to populate in Connect. EVV visits are also visible in our Case Management Portal (CMP) for DHS program staff. Connect is only available to Participants/Representatives and their Employees. To maintain the integrity of payroll data, this system is not available to anyone else, such as state staff or Palco staff. However, users with access to our CMP view the same timesheet and payroll data once submitted in Connect by the Participant/Representative or their Employee.

As a leader in this industry, Palco has developed a user-friendly secure web portal, Connect, which allows electronic timesheet submission by Employers and their Employees. It is accessible and functional 24 hours a day, 7 days per week except for limited maintenance times. Connect is fully integrated with our financial management system and the state's chosen EVV solution (AuthentiCare), provides real-time timesheet status information, offers real-time validation of timesheets to check for errors, electronically notifies the user of errors, and allows for corrections and resubmissions. The portal contains the following user-friendly and interactive features:

- Online time-entry, which is also supported on mobile devices.
- Integration with AuthentiCare, the state's chosen EVV solution.
- Seamless system that integrates enrollment, timesheet, and payroll information.
- Cutting-edge, cloud-based technology.
- Accessible and functional 24 hours/7days a week.
- Capable of auto-scaling during periods of high traffic.
- Enable users to view, update, and print real time and historical information including timesheets, payment requests, and mileage reimbursements for previous periods.
- Contains resources and reports for users, such as copies of documents, like paystubs and W-2s.

It has been our pleasure to work with the DHS program staff over the last 20 years. Our key personnel have a solid understanding of the program requirements and participant needs. We will leverage our program knowledge to help expand the growth of these programs, and help educate, train, and assist existing and new participants. We evaluate staffing needs in each department and expand as needed to maintain excellent customer service and financial management services and counseling support. Onboarding additional staff occurs as needed based on work volume, special projects, or new initiatives to ensure all stakeholder expectations and contract deliverables are being met and exceeded. Please see Section E.3 for a more detailed view of our Work Plan/Quality Management Plan (QMP) to outline policies, procedures, processes, and internal controls we have in place to adhere to the performance-based standards outlined in this RFP as well as Section E.2.B for a more detailed view of our staffing model and dedicated Arkansas support staff.

E.1.A. Sample MOU

D PALCO

PO Box 242930
Little Rock, AR 72223
Toll Free 866.710.0456
Online: PalcoFirst.com

MEMORANDUM OF UNDERSTANDING

May 31, 2022

As a contractor of the State of Arkansas Department of Human Services, this document represents a Memorandum of Understanding between Palco, Inc. and the State of Arkansas Department of Human Services.

Palco and DHS agree as follows:

1. Palco will meet the transition requirements established in RFP 710__-0018 section 2.5.2 and 2.5.3.
2. Palco will meet the requirements specified in 2.5.2 Transitioning, A-G.
3. Palco will meet the requirements specified in 2.5.3 Project Organization and Managements Requirements
   a. Provide a quality management system approved by DHS/DPSQA
      1. Provide a robust software system with capability to store, transmit and receive data from the Arkansas DHS Medicaid Management Information System (MMIS), Division of Provider Services and Quality Assurance (DPSQA) and Employment Clearance Registry System.
      2. Provide a web-based portal with access to reports, dashboards, and other data.
   b. Palco will remain integrated with the States EVV system and meet the certification criteria.
      1. Palco will provide a web-based system that does not require installation.
      2. Palco will maintain security controls and system backups per industry standards.

_____   _____
Palco, Inc   Date

_____   _____
State Official   Date

State of
County of
This record was acknowledged before me on this day _____ of _____, 20____

_____
Notary   My Commission Expires:

E.1.B. Employee Compliance Tracking

As part of our internal controls and quality assurance (QA) measures, we perform quarterly operations reviews of all key deliverables. We conduct monthly QA assessments, including a 15% sample of key operations. Some examples include, but are not limited to:

- Completion of the self-directing Employee enrollment paperwork.
- Completion of self-directing Employee enrollment activities, including completion of all required employment clearance registry checks and criminal background checks pursuant to ACA 20-77-128. Beginning June 1, 2022, we will ensure employment enrollment activities conform to the requirements set forth in Act 717.
    - o This includes completion of the following employment clearance registry checks:
        - Arkansas Adult Maltreatment Registry Check.
        - Arkansas Child Maltreatment Registry Check.
        - DHS and OIG Excluded Provider Checks; and
        - CNA Registry Check.
    - o We also ensure completion of the following criminal background checks:
        - State Criminal Background Check, and
        - Federal Criminal Background Check (if appropriate)
    - o We will incorporate the inclusion of a drug screen requirement as outlined in Act 717.

Palco will assist with the facilitation and administration of the criminal background checks in accordance with the program rules and relevant statute(s) during the enrollment process. This is accomplished by providing self-directing Employees the necessary forms to complete the checks, developing resources that guide them through the process, and collecting and processing particular forms. Palco understands the State of Arkansas' commitment and goals to move towards more electronic processing for background checks and is committed to assisting in that process. Palco is also willing to work with DHS program staff to improve the overall background check process by creating strategic pathways to make it more accessible to caregivers. We are passionate about building the direct support professional workforce and ensuring it is seen as a thriving career, not just a temporary job. Barriers to employment within self-direction in Arkansas such as limited access to notaries, fees associated with background checks, and access to background check locations will be mitigated with the in-state presence and statewide, geographically located support of the Palco team. Palco looks forward to brainstorming the following ideas, and more, in conjunction with the DHS team during our next contract term:

- Establishing regionally based notaries for self-directing Employees to access at no cost.
- Facilitating the process of Palco collecting and processing the State of Arkansas criminal background checks through the Arkansas State Police web portal.
- Establishing a process for the collection and remittance of payment for criminal background checks such as the collection from Participant budgets or processing payments provided by their self-directing Employees.

Palco feels confident that these enhancements in conjunction with our 20+ years of experience will breathe new life into the direct support professional workforce in Arkansas providing a new pool of eligible and eager caregivers to meet the needs of stakeholders.

E.1.C. Backup Plans

Palco's Counseling staff will assist the Participant/Representative in developing and implementing an Emergency Backup Plan and designating an Emergency Backup Caregiver, by engaging in a person-centered dialogue about the participant's natural supports. These conversations are helpful in identifying appropriate backup caregivers who can help when the participant's regular Employee cannot work for any reason. Our staff will also continue to assist the Participant/Representative in monitoring the effectiveness of their Emergency Backup Plan, including identifying additional natural supports as necessary. We strongly encourage DHS to consider requiring that identified backup caregivers formerly enroll in the event short-term support is needed during turnover of the primary self-directing Employee. We also encourage the Participant/Representative has the paperwork on file so that the temporary backup Employee is eligible to provide paid services without any administrative lag time in case of an emergency.

Emergency Backup Plans can be housed in our Case Management Portal (CMP) for easy access by DHS program staff and other support staff (like DHS waiver nurses). Palco Counseling staff will review Emergency Backup Plans at least annually with program Participants/Representatives but will also revisit the Emergency Backup Plan any time there is a change in condition or Employee turnover. Any changes to the Emergency Backup Plan will be housed in our Case Management Portal for quick access by external stakeholders like DHS program staff. Visit section E.5 and E.10 for more detailed information on the educational tools and resources that Palco has developed including a copy of the backup planning templates.

The backup plan currently being used for this program consists of the following documents:
- **Healthcare Emergency Card**; and
- **Backup Decision Tree**.

Please see **Appendix 1** for a copy of these resources.

E.2. Staffing

Palco exceeds the requirements outlined in the Scope of Work in this RFP. As evidence, we have included the proposed job description and minimum qualifications for the Contract Manager beginning on page 31, a detailed organizational chart listing all key personnel on pages 33-37 (with resumes on pages 38-53), a description of our experience providing self-directed services in Arkansas and other states beginning on page 54, as well as letters of recommendation beginning on page 65 and references with contact information on page 71.

YOU'RE ASSURED OF GETTING THE RIGHT PEOPLE

All our Officers, Directors, Managers, analysts, engineers, trainers, programmers, accountants, call center agents, enrollment specialists, and supporting field staff are Arkansas tested and adept in the latest requirements. We recruit and retain top talent who understand your program objectives and needs, work with DHS program staff closely and proactively, and who are currently connected to the program.
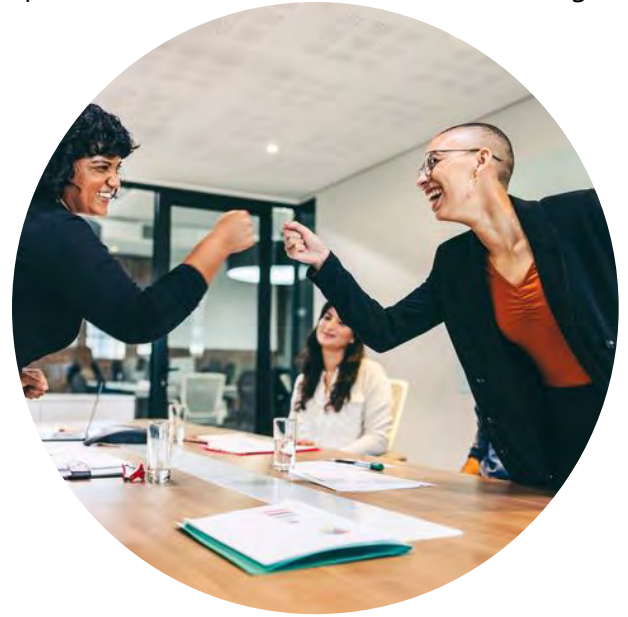
It has been our pleasure to work with the Arkansas DHS program staff over the last 20 years. Our key personnel have a solid understanding of program requirements and participant needs. We will leverage our program knowledge to help expand the growth of these programs and help educate, train, and assist existing and new participants. To support the growth in Arkansas, we evaluate staffing needs in each department and expand as needed to maintain excellent customer service and financial management services and counseling support.

Palco is a company founded on purpose and accountability. The Palco leadership team has been privileged to play a role in helping thousands of people across the country exercise choice in their in-home care. As self-directed services have grown, we have grown along with it. We credit our strength and endurance to a consistent approach to managing our business and our company culture and the people we serve.

Palco's leadership team performs complementary roles and is active in the day-to-day operation of the company. **Our Executive leadership team is no stranger to the heavy lifting it takes to move a company or transition a program successfully.** Their experience provides relevance paired with a commitment to community involvement, state business development, employee retention, deep policy understanding, historic perspective, and the credentials to match. They work as accelerators for the company and the entire Palco team. Members of the Executive Leadership Team will continue as lead collaborators with DHS program staff.

Palco's dedicated Arkansas staff meets all the following employee onboarding requirements before providing services pursuant to this solicitation:

- Adult Maltreatment Central Registry Check
- Child Maltreatment Central Registry Check
- Excluded Provider List Check
- Certified Nursing Assistant/Employment Clearance Registry Check
- State and federal criminal background checks including fingerprints
- Drug Testing

Our current Arkansas Contract/Account Manager, based in Little Rock, has served this program for the last five (5) years. The Contract/Account Manager regularly attends meetings, trainings, and other events as requested by DHS. Our staff will avoid any unnecessary conflict of interest by refraining from providing VF/EA services to family members. Palco will not restrict employees, agents, subcontractors, or principals who perform services for the State under this contract from performing the same or similar services for the State after termination of this contract, either as a state employee, an independent contractor, or an employee, agent, subcontractor, or principal of another contract with the State.

Palco is fully compliant and currently submits the required monthly reporting with a signed statement attesting compliance with the provisions set forth in Section 2.5.4.B for all new hires for the previous month. In addition, we will provide an updated operational roster, including all Arkansas dedicated staff, with each monthly report.

Palco is committed to providing the best practices in the field of self-direction. **The Palco team represents the top of their respective fields in finance, law, accounting, customer service, communications, human resources, organizational management, information technology, software development, and process engineering.** Our team has an excellent mix of professional competencies that brings synergy to our operations.

E.2.A. Contract Manager Job Description & Minimum Qualifications

The **Contract/Account Manager** provides the critical link between Palco and its various partners nationwide. These Managers are the one-call, one-stop solution to all client needs, questions, and issues. **Contract/Account Managers are the subject matter experts for the program or programs they support and provide expert-level knowledge to internal and external audiences alike.** These Managers balance their commitment to the company with an unyielding attitude of process and programmatic improvement. While still bound by all program rules, guidelines, and state and federal law, they never fail to consider how a program can be improved in terms of responsiveness, effectiveness, and service to the state and by extension the participant.

Contract/Account Managers are the subject-matter experts (SME's) in Palco processes and have an acute understanding of the inter-relatedness of company departments in the execution of program

responsibilities. This enables the manager to pinpoint bottlenecks and suggest comprehensive solutions by understanding intimately how departments function and how changes in one area affect operations in another. **Our current Arkansas-dedicated Contract/Account Manager has seven (7) years of experience supporting self-direction programs and resides in Little Rock, Arkansas.**

Contract/Account Manager Duties and Responsibilities:

- Field questions, issues and participant problems reported to program partners and Palco staff.
- Research issues and coordinate with other Palco departments, when required, to reach a resolution.
- Take a proactive approach with troubleshooting issues/concerns and implementing solutions for Clients and other external partners.
- Maintain an outcome-oriented, "can-do" attitude.
- Provide timely feedback to external partners and other Palco staff.
- Embody the highest degree of customer service in person-to-person, telephone, written, and electronic communication with partners.
- Provide expert level information of the workings of the program across all departmental workflows.
- Analyze complex issues into a series of manageable, and outcome-oriented solutions.
- Provide regular and consistent feedback and evaluation to Palco management and Clients in the interest of improving overall delivery of services.
- Proactive in gathering partner feedback regarding Palco's program-specific processes.
- Participate in regular round-table discussions with management and make relevant, business-based recommendations for improvement or remediation.
- Create a working file for training materials and all program updates.
- Create meeting agendas, schedule, and host regular meetings with Client, as well as webinar trainings with Palco staff and external partners.
- Create a high-level program overview report of the assigned accounts that will be presented on a quarterly basis.
- Participate in on-site partner training, meet-and-greets, and other activities as scheduled or assigned.

Contract/Account Manager Skills and Attributes:

- Possess good phone skills and ability to effectively communicate across all lines of business.
- Communicate effectively with a range of individuals with varying backgrounds, abilities and disabilities and communication styles, using person-centered techniques in all interactions.
- Represent Palco in all interactions with respective clients to which they are assigned.
- Handle difficult or unusual situations with professionalism and discretion.
- Participate in development, training, and other departmental meetings.

- Consult with peers or upper management on complex and unusual problems.
- Apply acquired job skills and company policies and procedures to complete standard tasks.
- Refer to policies and past practices for guidance.
- Possess strong analytical skills, decision-making skills, listening skills and problem-solving skills.
- Must have excellent verbal and written communication skills.

Contract/Account Manager Other Essential Traits:

- Possess good phone skills and ability to effectively communicate across all lines of business.
- Must possess basic skills with Adobe, Microsoft Word, Office, PowerPoint, Email, and Internet.
- Must be able to exercise tact and discretion under a variety of stressors.
- Must be able to multi-task and meet deadlines.
- Must understand and adhere to Palco's Core Values.

Contract/Account Manager Education and Experience:

- Minimum of a bachelor's degree required in business administration or related field.
- 3 years of account management or project management required.
- Customer relations experience a plus.
- Relevant work experience may substitute for all or some educational experience.

E.2.B. Detailed Organizational Chart (Key Personnel)

Figure 5 provides a detailed organizational chart, including the key Palco personnel that will be dedicated to this project and the work outlined in this RFP. **The Palco executive team are Arkansas natives, and all reside in Little Rock, Arkansas.** We are proud to serve our home state, working alongside DHS and other partners to improve the lives of Arkansans, and provide a cost-effective service delivery model to meet the needs of our community.

Figure 5: Palco Organizational Chart
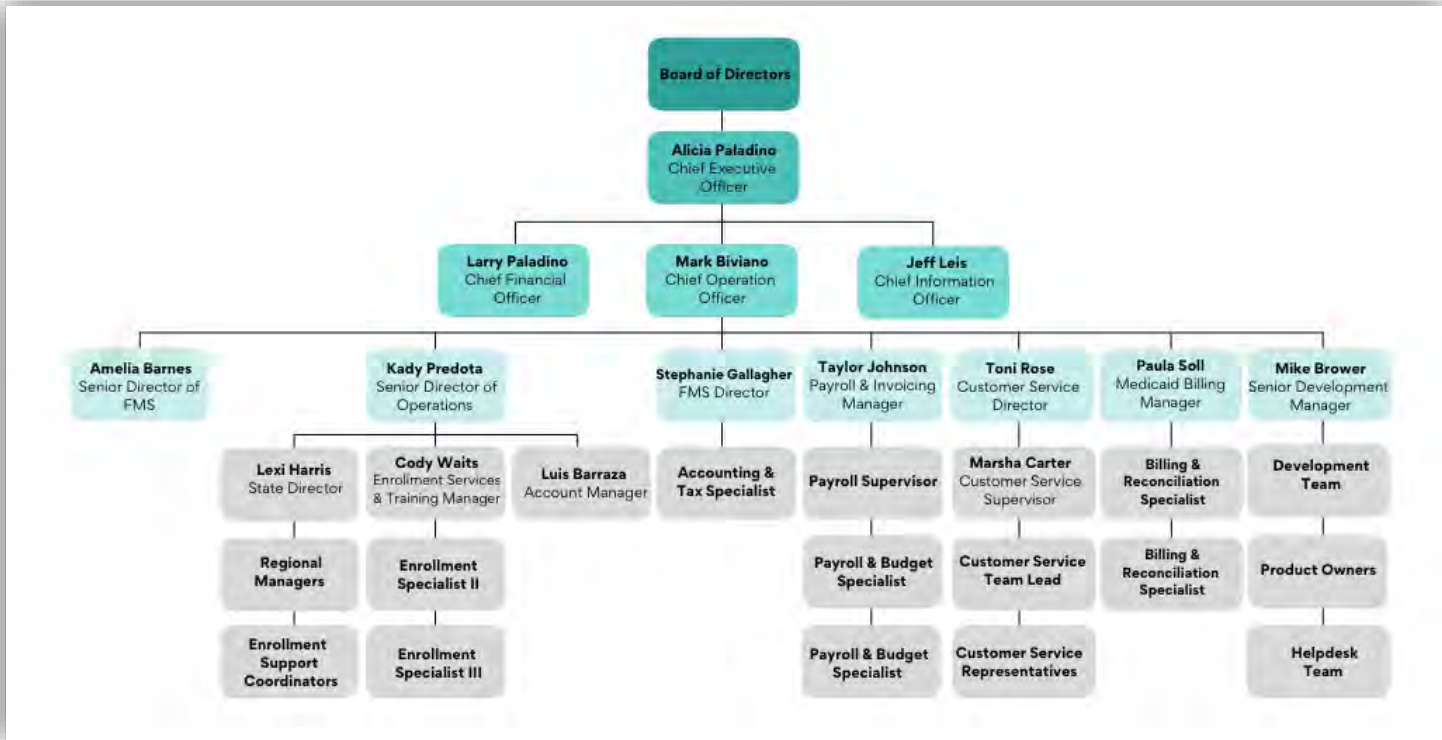
To support this program, the following Executive Leadership and senior management staff will be devoted to this project:

Personnel Identifier	Palco Personnel
Chief Executive Officer	Alicia Paladino, CPA, ESQ
Chief Financial Officer	Larry Paladino, CPA
Chief Operating Officer	Mark Biviano
Chief Information Officer	Jeff Leis
Senior Director of Operations	Kady Predota
Assistant FMS Director	Stephanie Gallagher
Director of Customer Support	Toni Rose
Senior Director of FMS	Amelia Barnes, CPA
Senior IT Development Manager	Mike Brower, MAcc

The Operations Team is composed of State Program Subject Matter Experts (SME) that provide leadership to the Palco staff members. They oversee the implementation of the project, ensure the day-to-day operations are being completed and all contract deliverables are being met.

The following Operations Team Subject Matter Experts will be devoted to this project:

Operations Team Identifier	Palco Operations Team
State Director	Lexi Harris, MHA
Contract/Account Manager	Luis Barraza
Enrollment & Training Manager	Cody Waits
Payroll & Invoicing Manager	Taylor Johnson
Medicaid Billing Manager	Paula Soll

To support the growth in Arkansas and new and existing program participants, we have a dedicated Enrollment and Counseling team. We currently have 22 Enrollment and Counseling field staff (commonly referred to as Support Coordinators) geographically located throughout the state. Palco Counselors are hired from and representative of the communities they serve.

We are committed to hiring professionals with lived disability experience and those who are members of diverse communities. We often find that Counselors are natural helpers in their communities, individuals that others turn to for advice or assistance, and bring an inherent level of trust and respect to this role that is difficult to replicate via trainings during the onboarding/hiring process.

The Enrollment and Counseling teams are led by a State Director, with each region having a devoted Regional Manager and Counseling field staff.

Our Enrollment, Counseling, and Customer Support (call center) teams provide training and customer support to individuals calling to conduct a self-directed eligibility pre-screening, as well as provide support to individuals regarding the completion of required enrollment forms and the development of their Cash Expenditure Plan (CEP). Our teams provide training and oversee the utilizations of budgets and work with the Participant/Representative on the allowed allotment of hours and savings opportunities, and the submission and approval of automated timesheets through AuthentiCare and the Palco Connect system.

Our Enrollment, Counseling, and Customer Support teams are closely aligned and share a customer relations management software to always be up to date with the most recent communications regarding the participant's budget, enrollment status, payroll information, etc.

All members of our team have access to our Case Management Portal (CMP) too which serves as resource to them when fielding questions through the call center or our shared email boxes. This interconnectedness ensures the Participants/Representatives, and their Employees have the most current information at their disposal.

*Figure 6: Palco Enrollment and Support Coordination Org Chart*
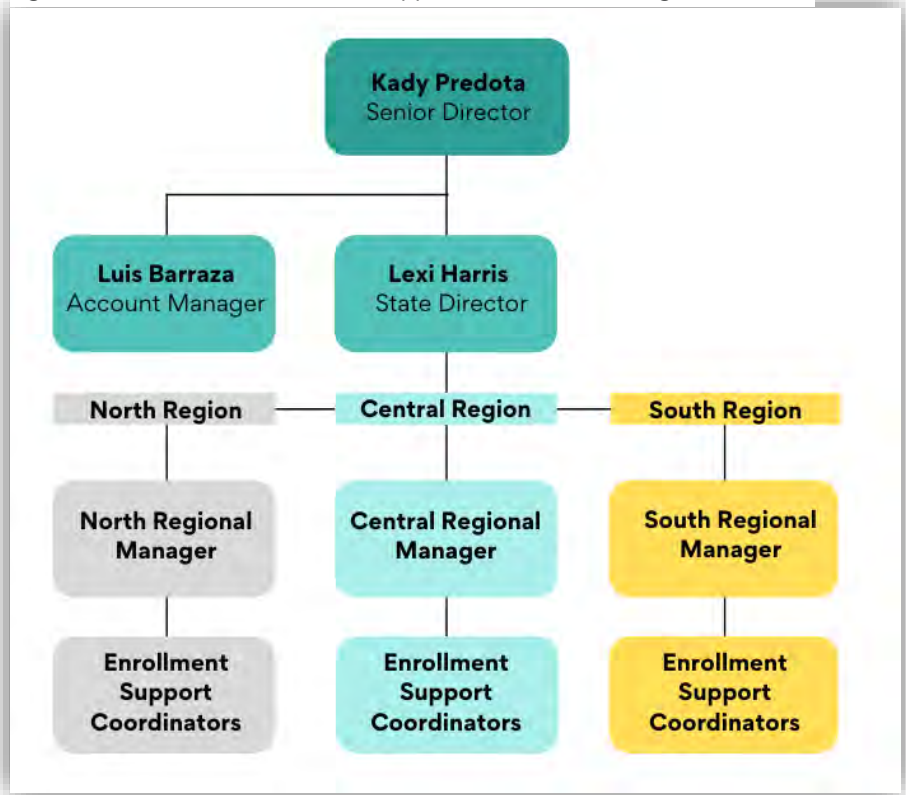
See **Figure 6** for Palco's Enrollment and/or Support Coordination Organization chart.

In addition to our geographically located Enrollment and Counseling teams, we have additional Palco staff members throughout the state. No matter where the Participant/Representative and their self-directing Employees are located, we have a friendly Palco team member nearby and ready to train, educate and assist as needed. See **Figure 7** for a representation of Palco's geographically located staff throughout the state of Arkansas.

Figure 7: Palco's Geographically located Staff
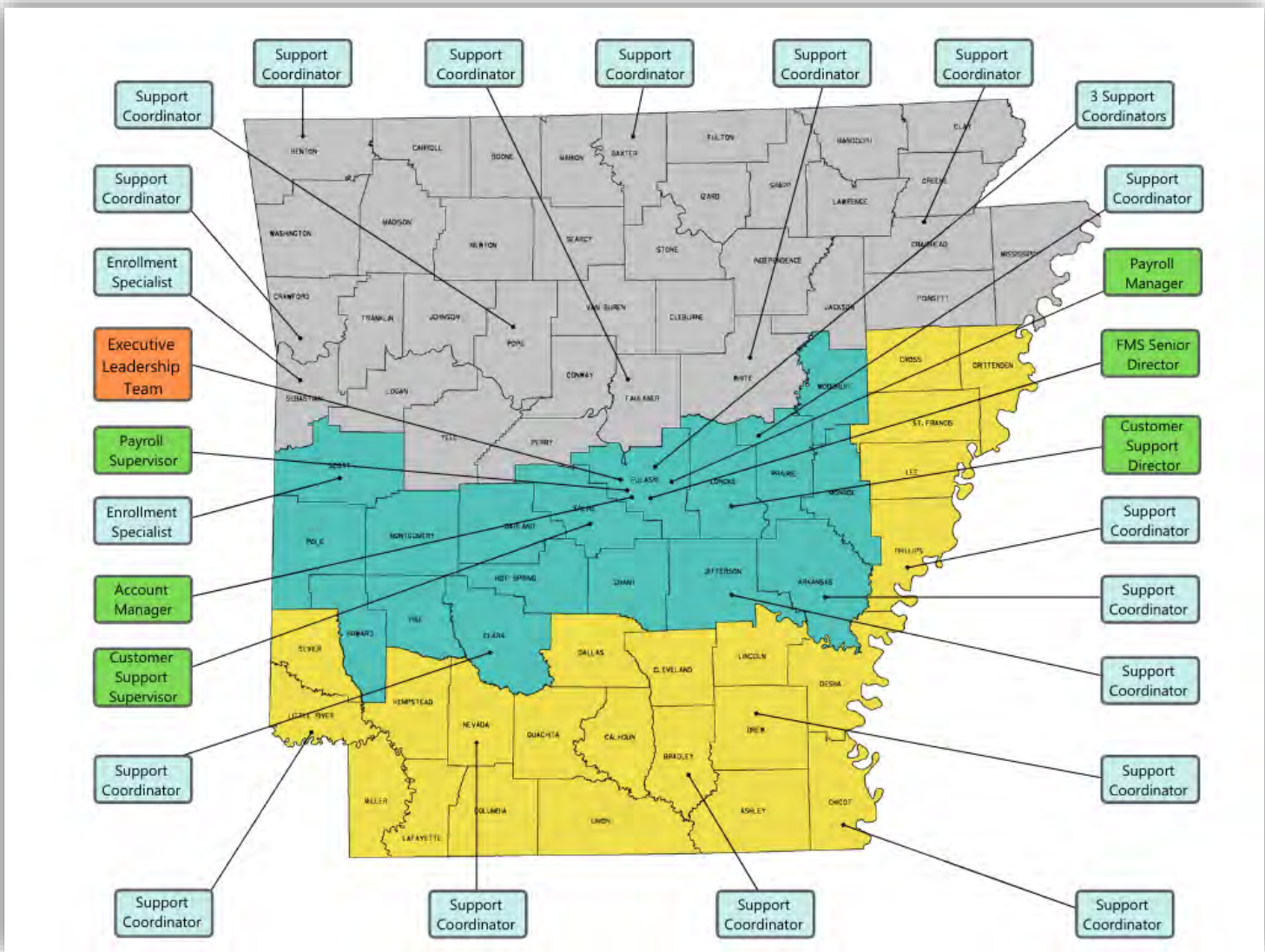
Alicia Paladino, CPA, ESQ

PO Box 242930, Little Rock, AR 72223 501.604.9936 alicia@palcofirst.com

Work Experience	**Chief Executive Officer, Internal Counsel, Palco, Inc.**

Work Experience

Chief Executive Officer, Internal Counsel, Palco, Inc.
January 2009 - Present
- Present Information about self-direction to stakeholders and provide advocacy for self-direction in Arkansas.
- Designed operational procedures, including design and implementation of QA/QI functions and maintenance of Policies & Procedures Manuals.
- Compiled financial and reconciliatory reports for interested parties.
- Researched various tax and labor issues and communicated findings.
- Coordinate contracts with government and agencies.
- Effectively aligns and manages the priorities of the executive management team and their departments.
- Leads and contributes to the development, execution and achievement of the Company's overall growth strategy.
- Builds, cultivates and manages a customer centric philosophy throughout the organization.
- Responsible for the strategic direction, to include positioning the company as a nationally recognized provider in the Fiscal/Employer Agent industry.
- Ensures that the most appropriate financial and non-financial results are being correctly measured and reported to the board of directors.

Law Clerk, Hyden, Miron & Foster, L.L.P.
Fall 2008
- Prepared individual, estate, and trust income tac returns.
- Researched tax, estate and probate issues and communicated findings.
- Prepared letters to clients and intercompany memoranda.
- Performed accounting functions for various estates and trusts.

Accounting Clerk/Bookkeeper, Jeremy Palmer, CPA, L.L.C.
May 2004 – May 2006
- Prepared individual income taxes
- Recorded transactions, reconciled bank accounts, and recorded adjusting entries
- Performed all payroll functions and filed related tax reports for non-profit organizations
- Prepared client billing and compiled period budgets
- Performed various functions as a member of the audit team

Education

Juris Doctorate, December 2009
University of Arkansas, Little Rock, AR

Masters in Business Administration, July 2009
University of Arkansas, Little Rock, AR; Magna Cum Laude

Bachelor of Science in Accounting, May 2006
Louisiana State University, Baton Rouge, LA

Professional Licensure

- Admitted to the Arkansas State Bar, April 2010
- Certified Public Accountant, May 2011

Memberships

- Arkansas Bar Association
- American Institute of Certified Public Accountants
- Arkansas Society of Certified Public Accountants

Publications

- Arkansas Real Estate Review, Arkansas Bar Association
  Case Abstract for City of Dardanelle v. City of Russellville in vol.1, no.2, Fall 2008
- Arkansas Real Estate Review, Arkansas Bar Association Case
  Abstract for Riddle v. Udouj in vol.1, no.1, Spring 2008

Larry Paladino, CPA

PO Box 242930, Little Rock, AR 72223 501.604.9936 larry@palcofirst.com

Work Experience

Chief Financial Officer, Palco, Inc.
July 2003 to Present
- Performed all accounting and tax duties associated with self-directed programs for over 4,500 individuals.
- Devises and tracks key budget, and financial metrics to ensure executive team can run business and Board can monitor execution and progress against targets.
- Oversees the fiscal activities of the company including budgeting, reporting and audits.
- Directs the financial business of the company, including ensuring the accurate and timely preparation of financial statements with supporting documentation.
- Develop, implement, and maintain policies, objectives, and short/long-term planning initiatives.
- Formulates and presents business review packages, including financial, performance measures, strategic budgeting, core metrics and cost drivers.
- Responsible for tax planning, facilitating tax preparation and ensuring timely preparation of tax returns.
- Ensures maintenance of General Ledger transactions, reviewing journal entries and accruals necessary to accurately reflect company activities.

President, Paladino & Company, P.A.
January 1995 to Present
- Directly responsible for over 200 clients.
- Day to day operations include supervising an accounting firm dealing with all aspects of corporate and individual tax, financial statement preparation, budgeting, payroll, and all other related accounting areas.

Senior Accountant, Lovett & Foster, Ltd.
November 1989 to December 1994
- Responsible for corporate and individual income tax preparation.
- Prepared financial reports.
- Worked with clients on a one-to-one basis regularly.

Education

Bachelor of Science in Accounting, 1974
University of Arkansas, Little Rock, AR

Professional Licensure

- Certified Public Accountant

Memberships

- American Institute of Certified Public Accountants
- Arkansas Society of Certified Public Accountants

Mark Biviano

PO Box 242930, Little Rock, AR 72223 501.604.9936 mark@palcofirst.com

Work
Experience

Chief Operations Officer, Palco, Inc.

2014 to Present

- Manages the operational controls, administrative and reporting procedures of the company.
- Ensures financial strength and operational efficiency.
- Oversees the transitions and program implementation plans.

State Representative, State of Arkansas

2010 - 2014

- Served on Committee on Insurance and Commerce, Committee on Public Health, and Committee on Revenue and Taxation.
- Sponsor of legislation to set up Healthcare Private Option in Arkansas. An innovative approach to expanding Medicaid population into the private sector
- Lead sponsor on legislation to establishing a not-for-profit state insurance exchange.

Vice President, SAP_Walldorf

2006-2010

- Responsible for industry leadership and management in the development, design and deployment of healthcare solutions, including industry requirements, partner strategy, and go to market plans.
- Served as the industry business unit's senior healthcare executive driving all sales enablement and marketing programs, strategy, customer programs, thought leadership, press and analyst activities.

Vice President, Oracle Corporation – Reston, VA

1998-2006

- Responsible for the strategic health initiatives and the expansion of the Oracle vertical model to the US Health Market.
- Managed a team of healthcare professionals in support of all Oracle healthcare strategies and sales support activities for application and technology products.

Education

Bachelor of Science in Finance, 1981
University of Arkansas at Fayetteville

Memberships

- American College of Healthcare Executives
- Healthcare Financial Management Association
- Healthcare Information Management Systems Society
- Center for Healthcare Information Management Executive

Jeff Leis

PO Box 242930, Little Rock, AR 72223 501.604.9936 jeff@palcofirst.com

Work
Experience

Chief Information Officer, Palco, Inc.

2010 to Present

- Designed and built MS SQL SERVER database for accounting firm
- Created custom XAML/WPF VB.NET based program (PalPro) which uses custom SQL database for full payroll, reporting, and change tracking purposes.
- Designed and implemented digital fax filing software to allow for paperless record management system.
- Maintain design and functionality of company website (www.palcofirst.com).

Software Developer, MedEvolve

2010 to 2011

- Delphi programmer assisted with the development of retail medical billing and scheduling software.
- Maintained SQL database scripts for a large number of programming requirements.
- Assisted individual clients with support and reporting needs.

HelpDesk Technician/Programmer, Benchmark Group

2007 to 2010

- Designed and wrote custom software using Visual Studio 2008, VB.NET, C#, and C++.
- Wrote technical manuals to assist with daily functions.
- Updated MS Office VBA scripts to new VB.NET add-in format for various software titles.

Sound/Lighting Director/Web Design, Digital World Productions

2006 to 2007

- Operated and installed sound and lighting equipment for concerts and other large media events across the region.
- Expanded company website and enhanced functionality using Flash, HTML, and a variety of other design software.
- Involved with the proper functioning and maintenance of multiple sound and lighting setups, including the use of specialized computer software and hardware configurations.

Education

Bachelor of Arts in Computer Science, 2007
University of Arkansas, Fayetteville, AR

Professional
Experience

Experienced with network infrastructure and hardware to support a business' growing technical needs

Kady Predota

PO Box 242930, Little Rock, AR 72223 501.604.9936 kady.predota@palcofirst.com

Work
Experience

Senior Director of Program Management, Palco, Inc.

2019 to Present

- Develop and leverage internal and external partnerships and network to maximize the achievement of long-term business goals.
- Provide overall direction and management of Account Management and Enrollment departments.
- Develop company processes and guidance for best practices utilizing national standards and successful outcomes.
- Research issues and coordinates with all Palco departments when required, to affect a solution.
- Work with key stakeholders to create and maintain integrated plans and budgets and ensure plans are progressing according to timing and budget expectations.

State Director, Consumer Direct Care Network Colorado

2015 to 2019

- Managed all aspects of the training and operations for Consumer Direct programs across the entire state of Colorado.
- Worked closely with The Department of Health Care Policy and Financing to implement rules and execute program changes.
- Developed and oversaw training curriculum and implementation.
- Attended and participated in monthly stakeholder meetings to gather input and empower clients to succeed.

Case Manager, Colorado Access – Long Term Care

2012 to 2015

- Provided case management services to individuals on long term care Medicaid waivers. Specialized in waivers such as Brain Injury, Spinal cord Injury and Elderly, Blind and Disabled.
- Completed high-level assessments of clients' needs to determine service eligibility.
- Balanced high volume of appointments and calls with ease while completing all work by deadline.
- Internal case manager board president.

Education

Bachelor of Science, Human Services, 2012 Metro
State University, Denver, CO

Professional
Experience

Person Centered Thinking Trainer, National Certification, 2018-present

Stephanie Gallagher

PO Box 242930, Little Rock, AR 72223 501.604.9936 stephanie.gallagher@palcofirst.com

Work Experience	

Work Experience

Assist FMS Director, Palco, Inc.

2021 to Present

- Directs all aspects of payroll processing and tax reporting.
- Establishes and oversees payroll processes and procedures.
- Designs short-term and long-term strategies to achieve continuous improvement and efficiencies in payroll processing and delivery operations.
- Keeps stakeholders informed about the status of payroll laws and regulations. Develops implementation plans for required changes to operations.
- Review and approve all quarterly and year-end filings.

Payroll Manager, Palco, Inc.

2020 to 2021

- Manage the payroll and data entry departments.
- Manages payroll operations and processes.
- Reviews payroll processing to ensure timely and accurate processing.
- Ensured federal, state, and local compliance.
- Maintains payroll staff by selecting, orienting, and training employees.
- Oversee and review payroll payments and account reconciliations.
- Managing and resolving any issues related to payroll.

Payroll Manager, Consumer Director Care Network

2018 to 2020

- Managed $500 million in payroll and tax operations.
- Ensure accurate and timely bi-weekly payrolls
- Manage day-to-day operations and supervised 12 team members. reports
- Process 49,000 W-2s for 9,000+ employers

Payroll Supervisor, Consumer Director Care Network

2014 to 2018

- Oversaw the payroll team in processing payroll for 22,000 caregivers.
- Supervised procedural analysis and process efficiency to maximize efficacy
- Developed and implemented payroll procedural changes.
- Provide job trainings and mentor team members as needed

Education

CPP Certification 2017 / Certified Payroll Professional Hellgate Highschool

Toni Rose

PO Box 242930, Little Rock, AR 72223 501.604.9936 toni.rose@palcofirst.com

Work Experience

Director of Customer Support, Palco, Inc.

2018 to Present

- Responsible for call center operations including call center performance and account manager effectiveness.
- Track ongoing call volume and work levels within the call center.
- Create detailed improvement plans, policies, and protocols.
- Ensure PHI/HIPAA guidelines are followed

Manager, Cardinal Health

2007-2018

- Responsible for a team of 28 customer service representative that supported and serviced Veteran Affairs Government and the Department of Defense accounts.
- Accountable for fostering continuous improvement and cultivating a culture where everyone's job is to improve their job.
- Demonstrated an aptitude for calculated risk taking and a bias of action over theory.
- Created an Enterprise Support Services team which took a consultative approach to identity areas of opportunity through projects that enhanced service experiences.
- Delivered results on foundation needs; meeting service level and delivering excellent quality.

Insurance Agent, Colonial Supplemental Insurance

2005 to 2007

- Opened and enrolled 9+ companies
- Maintained, traveled, and sold business to State of Arkansas employees
- Exceeded first year sales to over $100,000, tier-5 sales level goal.

Business Analyst, Alltel Corporation, Inc.

1989 to 2004

- Supervised and lead Service Center helpdesk for accounting applications.
- Developed written processes, and negotiated to resolve procedural issues with other groups
- Analyzed and reported statistical data that reflected performance.

Professional Experience

Six Sigma Yellow Belt Certification
Healthy Lifestyles Site Champion
Women IN Network South Mentor Program

Amelia Barnes

PO Box 242930, Little Rock, AR 72223 501.604.9936 amelia@palcofirst.com

Work Experience	**Senior Director of Financial Management Services, Palco, Inc**

2016 to Present

- Responsible for ensuring Palco meets its fundamental responsibility to clients in the form of accurate and timely payments, billing and withholding for programs.
- Responsible for other departmental activities, including processing enrollment paperwork, warehousing, and disbursing a variety of forms, as required by each program,
- Provides expertise in developing and recommending changes to existing corporate policy to increase the accuracy, efficiency, and responsiveness of the Financial Services Department.

Assistant Controller, Wilson and Associates, PLLC

2015 to 2016

- Responsible for the direct oversight of financial operations of company and all entities ensuring timely and accurate financial information is made available to the CFO and the management team.
- Worked under the guidance of the Chief Financial Officer in preparing and reporting financial statements conforming to principles of accounting and regulatory requirements.

Senior Audit Associate II, BKD, LLP

2012 to 2015

- Performed and conducted audit, review and attest services for financial statements, operations, internal controls, and process compliance for private companies ranging in size from 10K to over 150B in revenues.
- Prepared, examined, and analyzed complex accounting records, financial statements, and financial reports to ensure accuracy and conformance to reporting standards.

Education

Master's in Accounting, 2012
Hendrix College, Conway, AR

Bachelor of Science in Business Administration, 2012
Hendrix College, Conway, AR

Professional Licensure

Certified Public Accountant, 2013

Memberships

American Institute of Certified Public Accountants
Arkansas Society of Certified Public Accountants

Mike Brower

PO Box 242930, Little Rock, AR 72223 501.604.9936 mike.brower@palcofirst.com

Work
Experience

Senior Manager of Software Development & IT, Palco, Inc.

2020 to Present

- Manage internal and external software teams in the development of highly secure, massively scalable, cloud-based case management software.
- Implement and manage the complete software development lifecycle (SDLC), from analysis and design to development and implementation.
- Design and manage all support infrastructure, including on-premises and cloud-based components.

Senior Project Manager/Scrum Master, SURGE FORWARD

2013 to 2020

- Managed various IT projects ranging from simple implementation to enterprise level application deployment.
- Created new Agile processes for software development department and in other areas of the organization for better efficiency, ensure good product quality and to reduce waste.
- Managed multiple deployments for various services and ancillary applications across the organization from the IT department.

Manager of Software Dev. & Quality Assurance, XACTWARE

2001 to 2013

- Managed 6 development teams with 11 direct reports and 40 indirect reports.
- Developed EDI interfaces to external customers using FTP, IBM MQ Series, Oracle database objects, and C++
- Designed and oversaw development of legacy application integration modules.

Education

Masters of Accountancy in Information Systems, 1995
Brigham Young University, Provo, UT

Bachelor of Science in Accounting, 1995 Brigham
Young University, Provo, UT

Professional
Experience

Certified Scrum Master (CSM) - 2013

Lexi Harris, MHA

PO Box 242930, Little Rock, AR 72223 501.604.9936 lexi.harris@palcofirst.com

Work
Experience

State Director of Support Coordination, Palco, Inc.

2019 to Present
- Responsible for day-to-day Support Coordination Operations.
- Manages Support Coordinators in Arkansas' 3 Regions.
- Monitors enrollments for quality assurance.
- Responsible for hiring, training, and coaching staff members.
- Monitors Federal, State Compliance rules and Program requirements

State Director, Consumer Direct Care Network

2015 to 2019
- Responsible for day-to-day Support Coordination Operations.
- Maintain continuous service quality, monitoring compliance with regulations, and improve the economic standing.
- Effectively communicate across all lines of business in all methods provided.
- Responsible for hiring, training and coaching staff members.

Care Coordinator, United Healthcare Community and State

2010 to 2015
- Provide initial orientation to office policies and procedures.
- Maintain all employee's records to state standards pertaining to licensure, certifications, and mandated trainings.
- Create and facilitate all facets of training for new companion and home health aides.

Education

Master's in Heath Care Administration/Gerontology
University of Phoenix Central Florida

Bachelor of Arts in Sociology
Saint Leo University

Luis Barraza

PO Box 242930, Little Rock, AR 72223 501.604.9936 luis@palcofirst.com

Work
Experience

Arkansas Account Manager, Palco, Inc.

2015 to Present

- Responsible for Stakeholder Engagement
- Review Enrollment Paperwork
- Coordinate Communication between Clients and Support Brokers
- Assists in Training Implementation
- Creates Monthly Reports and Provides to the Department
- Participant in State Program Calls and Meetings

Team Lead Service Delivery, Teletech

2014 to 2015

- Provided Support to team and handled escalation calls
- Provided one-on-one coaching sessions and corrective actions.
- Monitored Customer Service Calls for Quality Assurance
- Managed System Transition/Implementation

Bilingual Customer Service Representative, Fidelity National Information Services

2013 to 2014
- Handled Customer Service Calls
- Provided Account Information to Customers in English and Spanish

Professional
Experience

7 years of Arkansas Self-Direction and Contract/Account Manager Experience.

Cody Waits

PO Box 242930, Little Rock, AR 72223 501.604.9936 cody.waits@palcofirst.com

Work Experience	

Work Experience

Enrollment and Training Manager, Palco, Inc.

2021 to Present

- Supervise Enrollment Department for all programs.
- Develop new enrollment forms
- Review department Quality Assurance with regular audits.
- Provide internal and external support for all training and communication.
- Provide system demos to clients and users
- Create marketing material, training guides, resources, and recordings

Account Manager, Palco, Inc.

2018 to 2021

- Responsible for overseeing consumer-directed programs in Kansas and Nevada.
- Assist in reviewing and developing program policies, procedures, and materials.
- Research issues creating, suggesting, and coordinating timely solutions.
- Provide regular and consistent process feedback and evaluation to management in the interest of improving overall delivery of services.
- Effectively communicate across all lines of business in all methods provided.

Director of Selection and Development, Northwestern Mutual

2016 to 2018

- Recruited financial advisors for the district office.
- Interviewed full-time and intern candidates through talent selection process.
- Created referral culture in office getting referrals from advisors.
- Trained and mentored interns to become full-time financial advisors.
- Recruited interns from Central Arkansas colleges and universities.
- Presented at career fairs throughout the state of Arkansas.

Promotions Director, Salem Media Group

2015 to 2016

- Planned and executed promotional events.
- Built and executed marketing plans that identify strong prospects to initiate sales opportunities – trade shows, pop-up events, on-location radio remotes.
- Planned promotional events and presented detailed reviews of results to upper management.

Education

Bachelor of Arts, Public Relations, 2009 Harding University, Searcy, AR

Taylor Johnson

PO Box 242930, Little Rock, AR 72223 501.604.9936 Taylor.Johnson@palcofirst.com

Work Experience

Payroll Manager, Palco, Inc.

2021 to Present

- Supervise payroll processors to ensure they have a proper understanding of payroll processes.
- Work with the development team to implement changes to our systems.
- QA payroll and system processes.
- Recruit and train new payroll processors.

Processing Specialist, Palco, Inc.

2020 to 2021

- Process payroll timesheets.
- Responsible for tax payments and garnishments.
- Perform bank reconciliation.
- Monitor payroll validations and budget checks.

Data Entry Specialist, Palco, Inc.

2019 to 2020

- Enter Timesheets and payable items into the system.
- Monitor timesheet files, documents and assign to appropriate departments

Property Manager, Twin City Properties/Affordable Granite and More

2018 to 2019

- Posted income and expenses in excel registries
- Paid Expenses and Created Payroll
- Balanced registries.
- Supervised project timelines and contract workers
- Inspected properties.
- Provided company helpdesk support

Education

Bachelor of Science in History with a Minor in Political Science University of Central Arkansas

Paula Soll

PO Box 242930, Little Rock, AR 72223 501.604.9936 paula.soll@palcofirst.com

Work
Experience

Medicaid Billing Manager, Palco, Inc.

2020 to Present

- Manages the Claims Department
- Oversees processing of all claim's submissions
  - o Monthly claims count of approximately 45K
- Oversees processing of all reconciliations to report to GL
- Supervise, direct, monitor, counsel and evaluate supervisory staff to ensure performance standards are maintained
  - o Establish and maintain metrics to effectively report outcomes to upper management
  - o Establish and update uniform policies to effectively manage various situations

Claims Director, Consumer Direct Care Network

2019 to 2020

- Manages the Claims Department, which consists of three divisions: Data Entry, Authorizations, and Billing
- Oversees processing of all authorizations and claims submissions
- Monthly authorization counts of approximately 5K – 6k
- Monthly claims count of approximately 450K
- Supervise, direct, monitor, counsel and evaluate supervisory staff to ensure performance standards are maintained
- Establish and maintain metrics to effectively report outcomes to upper management
- Establish and update uniform policies to effectively manage various situations

Program Specialist & Claims Examiner, State of Montana / DPHHS

2015 to 2019

- Oversees the development of health education and outreach materials
- Responds to inquiries concerning programs - Community First Choice (CFC), Big Sky Waiver (BSW) formerly known as HCBS, Hospice, Home Health
- Excellent organizational skills, including ability to multitask and perform tasks at all levels
- Ability to provide effective customer relations
- Excellent verbal and written communication skills
- Serves as a subject matter expert to others in the Division

Business Analyst, Xerox/Conduent/ Cognizant

2011 to 2015

- Operational development of new Enterprise MMIS system as the fiscal agent for Claims/ TPL/Resolution Departments

- Analyze current MMIS system, identify gaps and develop solutions to improve efficiency

- Conduct JAD sessions, perform UAT testing and smoke testing on the Enterprise MMIS system and any deployments

- Requirements gathering, designing and development of business rules for claims processing, and security

- Ensure system functionality and client requirements are met

- Maintain SLA (service level agreements) levels for client

Claims Supervisor, Xerox/Conduent/Cognizant

2004 to 2011

- Assisted Claims Manager in all aspects and functions of the Claims Department

- Supervised Document Control Dept., Claims Exam Entry Dept., Claim Resolution Dept and the Regional OCR Claims Processing Hub with over 20reporting staff

- Implement OCR Claims Processing Hub with new states within Xerox

- Develop and maintain business rules for claims processing for all states participating within the Regional Hub

- Technical documentation of system, develop and modify desk level procedures and operational processes

- Troubleshoot issues with claims processing and OCR issues

- Conduct JAD sessions, write new business rule s, perform UAT testing and assess possible impacts from changes system wide

- Maintain SLA (service level agreements) levels for client and OCR Claims Processing Hub

- Use of multiple proprietary software programs

Professional Experience

20 Years of Medicaid Billing Experience
MMIS Applications and Subject Matter Expert Areas: Claims, TPL, Resolution Document Control, Service Authorizations, CHIMES

E.2.C. Our Experience

In every service we provide and all programs we serve, we value our partnerships with state and local agencies, and take the utmost care in following and applying state regulations and program policy. Partners that have capitalized on our expertise have seen their programs run efficiently and cost-effectively, earning us high marks across the board in our services and capabilities. Palco has been providing FMS services since 1999 and has been a dedicated partner with the Arkansas Department of Human Services since 2003.

We meet or exceed all of the minimum qualifications outlined in Section 2.3 of this RFP. We are registered to do business in the State of Arkansas (see page 11, Certificate of Good Standing) and we have a Federal Employer Identification Number (see page 3, Vendor Agreement and Compliance). Additionally, we have served as a Fiscal Employer Agent providing financial management and counseling services to over 3,000 beneficiaries for more than the last five (5) years. We are not direct service providers of any Medicaid services and do not use a payroll reporting agent, as evidence by the Vendor Agreement and Compliance outlined on pages 2-3 of this proposal.

We have no judgments, pending lawsuits or actions against us including termination(s), suspension, imposition of penalties, or other actions against our firm.

SIMILAR CONTRACTS

In this section, we supply a **complete, relevant, and current client listing** wherein we provide the same or similar services as outlined in this RFP. We are proud to say that we have maintained a good standing with all contracts and have been continuously praised for our services.

Arkansas Self-Direction Program
Arkansas Department of Human Services
Division of Provider Services and Quality Assurance
Sarah Schmidt, Deputy Director
P.O. Box 8059, Slot S427
Little Rock, AR 72203
501.320.6555
sarah.schmidt@dhs.arkansas.gov

Dates of Performance: 1999 – current
Services Provided: VF/EA services, in-home supports counseling for self-direction, employer and budget authority training, call center support, reporting, billing and claims processing, self-directed software solutions, and other financial management services, CMP web portal services, online enrollment (Intake), electronic timesheet processing (Connect), individualized EVV technical support for program participants.

Program Description:

In 2001, we were asked to step into the role of the general contractor, assuming all VF/EA functions, including operating a toll-free call center, performing enrollment activities, monitoring spending, issuing reports, and much more.

The stabilization under our leadership allowed the state to offer the pilot program statewide. Over the next five years, IndependentChoices, a State Plan service under §1915(j) of the Social Security Act, grew from just a few hundred participants to nearly 3,000. During this time, we also worked on short-term projects, including a project with two Area Agencies on Aging and the DHS Division of Developmental Disability Services. Prior to implementing these projects, we were given a short setup time, but we were able to design process flows and develop and write policies and procedures to meet program objectives.

In 2014, we began providing in-home training, education, and technical assistance on the Arkansas self-direction service program model and requirements including the rights, risks, and responsibilities of participating in a self-direction service delivery model and how to engage in both budget and employer authority. We have seen improved programmatic compliance, utilization of tools that strengthen an individual's ability to direct their care, and overall enhanced participant satisfaction. Each year, we survey both participants and caregivers and are consistently given 98% satisfaction rating for our VF/EA and in-home skills training services.

The State benefits from having Palco as the statewide VF/EA for over twenty years, as we ensure uniformity in reporting and streamlined accounting practices. Moreover, the operational backbone we created and refined has become the model for other states' programs. Palco's expertise in the storage, compilation, and organization of data in a way that assists program developers and decision-makers is widely recognized as VF/EA best practices in self-directed programs across the country. Our impeccable record and performance have earned us invitations to present nationally on the topic of self-direction to other states interested in implementing similar programs.

In the last two decades of working with the program, we have watched it improve under our leadership in partnership with the Arkansas Department of Human Services. We have been faced with and adapted to a variety of changes, including consolidation and implementation of various waivers; significant program growth in short periods; changes in State software and billing systems; modifications in the statewide delivery system of home and community-based services and supports; various industry changes, such as IRS changes in reporting, forms, and procedures and Department of Labor overtime and wage reporting changes; overhauls in program policies; implementation of Palco's online self-service portals statewide, and more.

On a national level and in Arkansas, Palco works closely with First Data Government Solutions (FDGS) to provide an EVV-compliant solution for the Arkansas self-direction program, meeting the requirements of the 21st Century Cures Act. For this opportunity, Palco will continue to partner with

FDGS to support the full set of requirements in this RFP. Palco is a preferred partner of FDGS and our seamless integrations with this state sponsored vendor provides exponential cost savings and benefits to both DHS/DPSQA and the program stakeholders. More information about this integration and partnership can be found in Section E.13.

Palco is proud to have pioneered self-direction, which has helped so many in Arkansas and across the country. We are currently serving over 2,300 program participants and providing payroll services to approximately 3,400 self-directed employees.

Pennsylvania Self-Directed Programs
Pennsylvania Department of Human Services
Office of Developmental Programs
Charles R. Frick, Section Chief
Division of Program Operations, Bureau of Community Services
625 Forster St
Harrisburg, PA 17120
717.783.8751
cfrick@pa.gov

Dates of Performance: 2018 – current
Services Provided: VF/EA services, employer and budget authority training, call center support, Medicaid billing and claims processing, timesheet processing, background checks, online enrollment (Intake), electronic timesheet processing (Connect), CMP web portal services, in-person and web-based training, workers' compensation, a compliant EVV solution, integration with EVV aggregator (Sandata), processing payments for participant-directed good and services and vendor services, and reporting.

Program Description:
In 2018, Palco began providing VF/EA services for three waiver programs administered by the Pennsylvania Department of Human Services, Office of Developmental Programs (ODP). Each of these waivers offers a large array of services to its population, with Palco currently serving over 1,000 participants and providing payroll services to over 3,300 Service Support Professionals. These services have unique requirements, with some services billed with daily units and others at 15-minute increments/units. Our timesheet portal (Connect) allows users to select only services and related modifiers for which they are authorized and credentialed and includes built in validations to prevent over-billing.

In Pennsylvania, we work with several stakeholder groups at the local, regional, and state level. In 2018, we engaged a diverse stakeholder group to form a working Advisory Board consisting of self-directing Participants, Common Law Employers, Support Brokers, and ODP staff. This group continues to meet quarterly to review enrollment patterns, service oversight, and upcoming initiatives impacting the program. With a diverse set of stakeholders present, we often discuss grass-roots issues facing the self-direction community and brainstorm innovative solutions and approaches.

We also provide outreach and educational presentations to local entities including county staff, support broker organizations, and interested parties on the benefits of self-direction and the services we offer as a VF/EA FMS provider. Additionally, these groups have requested our participation in panel discussions at local and state conferences and symposiums on self-direction.

We work closely with First Data Government Solutions (FDGS) to provide an EVV-compliant solution for the ODP participant-directed services programs, meeting the requirements of the 21st Century Cures Act. We also work closely with Sandata, integrating our EVV and billing software with the EVV aggregator for the state of Pennsylvania.

Colorado CDASS Program
Colorado Department of Health Care Policy & Financing
Office of Community Living
Erin Thatcher
Participant Directed Program Policy Supervisor
1570 Grant Street
Denver, CO 80203-1818
303.866.3641
erin.thatcher@state.co.us

Dates of Performance: 2019 – current
Services Provided: F/EA services, budget authority training, call center support, reporting, Medicaid billing and claims processing, background checks, timesheet processing, online enrollment (Intake), electronic timesheet processing (Connect), CMP web portal services, web-based training, workers' compensation, EVV.

Program Description:
In 2019, Palco began providing F/EA services for the Consumer Directed Attendant Support Services (CDASS) program administered by the Colorado Department of Health Care Policy and Financing. The CDASS program lets participants direct and manage their attendants who provide personal care, homemaker, and health maintenance services, rather than working through an agency. We are currently serving approximately 700 participants and providing payroll services to 2,300 self-directed workers.

We work closely with Case Managers and Case Management Agencies on the prior authorization of services. Case Managers utilize our budgeting tool and our Case Management Portal to establish a prior authorization request. The CDASS budget calculator is a good example of how we currently accommodate a sophisticated task and hours set up to determine budget allocations including daily rates that compute into a monthly and annual allocation.

In 2021, we successfully transitioned 300 program participants, their authorized representative (if applicable), and their attendants (workers) when another FMS vendor abruptly exited the state. During

this transition, Palco encountered a bifurcated tax year and were successful exchanging data, providing positive web-based training on our systems, and obtaining optimistic enrollment statistics.

Between 9/1/21 - present, we have worked closely with HCPF staff, the CDASS training and operations vendor, and Case Managers and Case Management Agencies on four rate revisions, one statewide minimum wage project, and one city-specific minimum wage project. Throughout our contract, we have participated in numerous policy workgroups including a background check workgroup, rate change workgroup, EVV compliance protocol workgroup, as well as monthly meetings for the Participant-Directed Programs Policy Collaborative (PDPPC). Lastly, we engage in an annual project to recertify each CDASS Attendant's live-in exemption status which determines whether an Attendant is required to use EVV during the upcoming fiscal year.

We work closely with First Data Government Solutions (FDGS) to provide an EVV-compliant solution for the CDASS program, meeting the requirements of the 21st Century Cures Act. We also work closely with Sandata, integrating our EVV and billing software with the EVV aggregator for the state of Colorado.

Kansas WORK Program
Kansas Sunflower Health Plan
Stephanie Rasmussen
Vice President of Long-Term Services and Supports
8325 Lenexa Dr.
Lenexa, KS 66214
785.218.9391
srasmussen@sunflowerhealthplan.com

Dates of Performance: 2019 – current
Services Provided: F/EA services, employer and budget authority training, call center support, reporting, Medicaid billing, online enrollment (Intake), electronic timesheet processing (Connect), CMP web portal services, web-based training, workers' compensation, EVV.

Program Description:
Palco successfully implemented F/EA services for this program administered by the Kansas Department of Health and Environment, Division of Health Care Finance. Palco has worked alongside Sunflower Health Plan, a managed care organization, to deliver F/EA services to consumers eligible for Working Healthy who need assistance with activities of daily living and participate in the KS Work Opportunities Reward Kansans (WORK) self-direction program. We are currently serving over 100 participants and providing payroll services to over 200 self-directed workers.

Over the course of two months, Palco transitioned this program while Sunflower Health Plan reaped the benefits of this change by having more streamlined processes and capitalizing on our wealth of expertise with administering self-directed programs.

Palco provided many online webinar trainings including enrollment training and online timesheet training with participants and workers, training with the Independent Living Counselors (case managers) and Sunflower Support Coordinators over a two-week period. We also trained vendor agencies on their processes as well. We engaged in an extensive outreach campaign to provide individualized training to participants and workers to ease the transition.

More recently, we worked closely with this MCO to adjust participant budgets ahead of a 1/1/22 rate increase and have also engaged in a couple of recent projects related to background check compliance and worker rates of pay. Each of these projects entailed careful planning, various forms of stakeholder engagement including individual outreach by Palco enrollment staff and informative eblasts to stakeholders with detailed instructions on next steps.

We work closely with First Data Government Solutions (FDGS) to provide an EVV-compliant solution for the KS WORK program, meeting the requirements of the 21st Century Cures Act. When Kansas implemented EVV in 2019, Palco provided training resources for the KS WORK program participants that set the stage for our ongoing approach to EVV training to ensure communication materials are robust but user-friendly.

Nevada HCBS Program
Nevada Dept of Health & Human Services, Aging and Disability Services
Courtney Keys
Development Specialist IV/Specialized Unit Supervisor
9670 Gateway Drive, Suite 100
Reno, NV 89521
775.687.2675
ckeys@adsd.nv.gov

Dates of Performance: 2013 – current
Services Provided: F/EA services, call center support, reporting, billing, financial management services, online enrollment (Intake), electronic timesheet processing (Connect), CMP web portal services, web-based training, and payment for vendor services.

Program Description:
Since 2013, we have worked with the State of Nevada to serve hundreds of families and children with developmental disabilities. In serving this program, we provide webinar-based training to stakeholders and written materials and budgeting tools to case managers for developing person-centered plans.

We transitioned this program from an incumbent of 10+ years and as such, we encountered a bifurcated tax year and various unreported and incorrect tax withholdings and filings by the prior vendor. We spent countless hours with the Nevada tax agencies sorting through these issues. We led the State through this process seamlessly, and families praised Palco during the transition and

thereafter. We currently serve approximately 460 families. We continue to receive repeat business in Nevada.

New Mexico Programs
Conduent
Kevin Norris
Account Executive
PO Box 27460
Albuquerque, NM 87125-7460
505.639.8808
kevin.norris@conduent.com

Dates of Performance: 2020 – current
Services Provided: F/EA services, system access and integration, reporting, online enrollment (Intake), electronic timesheet processing (Connect), CMP web portal services, payments for vendor goods and services, financial management services, workers' compensation, EVV.

Program Description:
Palco currently provides F/EA services for three self-directing programs in New Mexico serving over 4,400 participants and providing payroll services to 12,200 self-directed workers. Palco provides the infrastructure and support for all operational duties of these self-directing programs which include State waivers and a managed care program. We also support hundreds of provider agencies in their efforts to comply with EVV and the 21st Century Cures Act by providing training to agency administrators, assisting with their EVV onboarding, and set up, and general technical support as needed.

At the inception of this contract, in 2020, Palco successfully transitioned 4,000 participants from another FMS entity over the course of a short seven-week transition period. During this time, Palco also partnered with the State to implement a brand-new waiver with self-directing services for a new group of individuals seeking long-term services and support.

Additionally, Palco worked in tandem with the State to provide technical EVV services to over 2,000 participants and 200 provider agencies. Bridging the gap as a translation service, our IT capabilities handled the data between the MMIS and EVV systems with elegant accuracy. To further ensure success we provided training to the agency staff, and their thousands of workers, on EVV systems and processes.

We are currently engaged in a Phase 2 development process to streamline Medicaid billing and claims processing, as well as introduce frequent pre-payroll eligibility checks to enhance current program operations.

We work closely with First Data Government Solutions (FDGS) to provide an EVV-compliant solution for the fee-for-service self-directing New Mexico programs, meeting the requirements of the 21st Century Cures Act.

Ohio Elderly Services Program
Council on Aging of Southwestern Ohio
Monica Schulze
Business Relations Partner
4601 Malsbary Rd.
Blue Ash, OH 45242
513.746.2088
mschulze@help4seniors.org

Dates of Performance: 2022 – current
Services Provided: F/EA services, system access and integration, call center support, reporting, online enrollment (Intake), electronic timesheet processing (Connect), financial management services, workers' compensation.

Program Description (Sample Projects):
Palco will provide services to approximately 500 clients in the Elderly Services Program, administered by the OH Council on Aging. Implementation is slated for summer 2022. Palco will provide infrastructure and support for all operational duties of this self-directing program, undergoing a transitional period to shift existing clients from another FMS entity over the course of a few weeks.

Our partner in Ohio, the Council on Aging of Southwestern Ohio, developed an EVV-like mobile application to serve their home- and community-based services workforce. As their newly awarded FMS vendor, we are working closely with our OH partners to develop Application Programming Interfaces to integrate with their solution. In doing so, we will be able to easily exchange data in real-time to ensure we have accurate data for payroll processing purposes and tax reporting. This will also create a seamless integration for program stakeholders to submit and manage their time.

Veterans-Directed HCBS Programs
State of New Mexico
Anthony Romero
Acting Director, Consumer and Elder Rights
PO Box 27118
Santa Fe, NM 87502
505.795.1196
anthony.romero12@state.nm.us

Dates of Performance: 2016 – current

<u>Services Provided</u>: F/EA services, budget training, call center support, reporting, billing and claims processing, financial management services.

<u>Program Description:</u> In 2009, Palco became the country's first Fiscal Employer Agent (F/EA) for the U.S. Department of Veterans Affairs-funded veteran directed-HCBS program, implemented by the Central Texas Area Agency on Aging. Since that time, we expanded our delivery of F/EA support to other VD-HCBS programs, and we continue to serve Veterans programs in New Mexico and Nevada. We not only perform F/EA services and call center support, but we also provide training and technical assistance for support staff.

AMERICAN RESCUE PLAN ACT

In 2021 and 2022, Palco has taken the initiative to partner with states to administer funds as part of the American Rescue Plan Act (ARPA) and ensure seamless payments to stakeholders were made. Over $50 million in ARPA funding will be disbursed by Palco in 2022 to support the efforts of our state partners. When you partner with Palco as your FMS, you get more than just payroll. Palco staff are dedicated and active participants in workgroups and stakeholder engagement that are focused on program enhancements and initiatives seeking to enhance the lives of the people we serve and those direct support professionals whose compassion and initiative make participant independence a reality.

OTHER SERVICES

Palco has worked with non-profits and state governments to deliver home and community-based support to a variety of programs, including pro tempore or grant-funded programs. Partners continually turn to us to assist in program development and implementation, design systems with quality controls, and deliver financial services and person-centered training. In addition, our parent company performed a variety of payroll, accounting, and tax services for hundreds of entities across multiple states for more than 25 years.

YEAR-OVER-YEAR GROWTH

Our goal is not to be the biggest Financial Management Services provider in the sector. Our goal is to be the best FMS partner in the sector. DHS can count on integrity, technology, and customer service underscored by collaboration. We know that the best work evolves from listening to our clients and having the established discipline to define the solution and processes which enable improvement.

Our year-over-year (YOY) growth demonstrates solvent financial health, measured growth, and our scalability to meet the demand of any sized program see **Figure 8**.

Figure 8: Palco Year over Year Growth

Additional insights from 2015 – 2020 show steady productivity, absorption of expansion, and operating efficiency. This is only one measurement of Palco's organizational health and program performance.

We like to say that our organizational health is composed of three things:

- How well we align around a common strategy.
- How our strategy translates down into the work environment.
- How well we renew over time, an indicator of two things:
  - o Looking outside, staying in tune with our clients and their program participants, and
  - o Having an internal innovation engine so those insights are incorporated into the process, product, and/or service delivery within Palco and turned into something useful in terms of driving innovation and new capabilities to improve the lives of the people we serve.

Palco believes we are corporate citizens in the communities we serve and work to create a positive impact by creating short-term and long-term value for the entire community of stakeholders. Because values and culture are inextricably linked, talking about them is not enough. Our leadership acts in line with our company values: **Accountability, Professionalism, Expertise, Trust, Responsiveness, Courage, Respect, Leadership.**

Further, it is times of crisis that test the practices of a company, its partners, and maybe most importantly their dedication to the task at hand. Palco has successful FMS relationships in eight states, and together with partners like you, we have successfully managed the major health care crisis COVID-19 forced us to face. We have been tested and have grasped that we will meet the demand of unforeseen challenges and, even more important, meet any challenge as a team.

EXTERNAL CERTIFICATIONS

Palco's team of qualified experts possesses a wide range of professional licenses, certifications, education, and demonstrated experience that gives them the capability to provide you with the highest grade of expertise. They are well versed in applicable FMS/Counseling specifications and codes and are very accustomed to familiarizing themselves with client and project-specific needs and requirements.

Our expertise includes:

- Certified Person-Centered Trainer
- Skilled Medicaid MMIS billing and claims team with over 40 years of experience
- Multiple Lean Six Sigma (yellow belt, green belt) certified IT team
- Certified Scrum Master/Agile Certified
- Multiple staff with advanced degrees (e.g., MBA-Accounting Information Systems, MS-Information Systems, MS-Information Technology, MS-Computer Science, MHA, MPH, DrPH, JD)

- Project Management Professional (PMP) Certified
- HIPAA Certified
- HITREC Certified
- Certified Public Accountants

PROFESSIONAL MEMBERSHIPS

- Arkansas Bar Association
- Arkansas Society of Certified Public Accountants
- American Institute of Certified Public Accountants
- Applied Self-Direction
- Accredited Standards Committee (ASC) X12

LETTERS OF RECOMMENDATION

Palco has developed lasting relationships with States, managed care organizations, and other stakeholders. We provide as evidence the following letters of recommendation.

Pamela & Robert Zotynia
25 East Broadway Street
Larksville, PA 18651
pzotynia@gmail.com 570-760-6399 rzotynia@gmail.com

To Whom it May Concern:

Please accept this letter in support as our expression in support of Palco, the financial management service currently supporting Robert's home and community-based services program in Pennsylvania.

Throughout Robert's life, he has used a variety of service models including traditional, agency with choice, and vendor fiscal employer agent. We have experienced several transitions including model to model and vendor to vendor. We anticipate and prepare for service disruption each and every time we initiate a transition, whether by our own choice or due to a provider's desire to no longer offer support.

When Pennsylvania announced the transition from the previous vendor to Palco, we were initially concerned and expected service disruption since we had experienced this several times before. We were pleasantly surprised with the well thought out planning and smooth transition with no disruption to the services Robert depends on. Since Palco assumed this contract, Robert's supports service professionals have been paid consistently and on time, with one exception that result in a 3 day delay for payroll processing. On the rare occasion when there is an error with a timesheet, Palco's customer support has assisted with resolution in a timely manner without delaying payroll processing.

We wish this was true with previous transitions. When Pennsylvania transitioned to the provider who previously held the contract, it was not smooth. We spent a great deal of time resolving issues, with support from the Office of Developmental Programs, so that the support service professionals could be paid. This created a great deal of stress for our family, the support service professionals, and most importantly Robert- who spent many weeks & months wondering if he would continue to receive support if his staff did not receive payment as expected.

Because of the support we receive from Palco, Robert made the decision to assume the role as Common Law Employer- the final step in his life-long journey to assert choice and control and truly self-direct his supports. This decision required much planning and coordination due to his physical & communication challenges. In consultation with Palco's management team, we feel confident in their team's ability to provide appropriate accommodations so Robert will be able to comply with the rules and responsibilities he, and all other Common Law Employers, are required to meet in this role.

Because of previous experience with other vendors, we are concerned that this support and consistent service may not be available to Robert in the future.

We strongly support Palco and hope they will continue to provide financial management services to people, like Robert, who choose to self-direct their supports in Pennsylvania.

Respectfully,

Pamela & Robert Zotynia

05/18/2022

Cheryl Laaker
Manager for Community Engagement
WORK program, KS
8325 Lenexa Dr
Lenexa, KS 66214
913-396-2397
Cheryl.l.laaker@sunflowerhealthplan.com

To whom it may concern:

RE: RFP for Financial Management and Counseling Services

Our health plan has utilized Palco, Inc as the financial management agency and customer support lead for our WORK (Work Opportunities Reward Kansans) program since 2019. In this program, consumers can self-direct their personal care and the fiscal intermediary is responsible for all payroll, enrollment, taxes and customer service tasks related to the self-directed program. Our clients and staff have been satisfied with the services provided by Palco and enjoy working with key staff within Palco. The partnership between our offices has produced positive advances for our clients and overall improvements to the health of the program. I would recommend the services of Palco, Inc.

Palco stays in tune with the program health and makes it a priority to anticipate program growth and process improvement by seeking collaboration. The leadership team at Palco - Alicia Paladino, Mark Biviano, and Kady Predota are extremely responsive and engaged in the program health. The dedicated account managers and enrollment specialists make managing the program and communicating on key items a breeze. As new program rules or policies are developed, the Palco team is always at the table as a willing partner to help discuss milestones and partner on department-led initiatives. This collaboration ensures that both the Palco team and our organization are aligned and seamless in our messaging to stakeholders. This has been an integral part to the success of our partnership.

In addition to the information above, Palco also provides customer services support for our program participants choosing self-directed services. They are available to help answer questions, provide training and issue resolution support. Palco partners with us to adapt and develop updated and new materials regularly to best serve the participant's needs.

In 2021, we in partnership with Palco implemented Electronic Visit Verification (EVV) as part of the Federal Mandate. Palco has integrated with our state system as well as provided their own system and positive contributions to ensure payments to members and compliance is met. Palco took on the role of training for stakeholders and did regular communication above and beyond the scope of work to ensure the population could transition to the new system. Palco leadership attended daily meetings during the project implementation to provide input and strategize with the us on solutions and best practices.

We have appreciated working with the Palco team and we look forward to our continued partnership with them. If I can provide you with additional information, please feel free to contact me at Cheryl.l.laaker@sunflowerhealthplan.com

Sincerely,

Cheryl L Laaker

COLORADO
Department of Health Care
Policy & Financing

1570 Grant Street
Denver, CO 80203

May 18, 2022

Arkansas Department of Human Services
Division of Provider Services and Quality Assurance
P.O. Box 8059, Slot S427
Little Rock, AR 72203

RE: Arkansas RFP for FMS Vendor Fiscal/Employer Agent Services

Ms. Schmidt,

The Department of Health Care Policy and Financing, in Colorado, has utilized Palco, Inc. as a Financial Management Services (FMS) provider for our Consumer-Directed Attendant Support Services (CDASS) program since 2019.

Palco performs duties set forth in Revenue Procedure 70-6 IRS Notice 2003-70 and is identified as a designated agent under Section 3504 for our HCBS aged, disabled, and developmentally disabled Medicaid participants. In 2022, Palco has provided services for nearly 700 CDASS members supported by 2,000 employees across Colorado. Palco has processed payments in accordance with Generally Accepted Accounting Principles and state labor laws and accurately billed for services. It has demonstrated adherence to program policies and procedures.

Based on the most recent CDASS FMS member satisfaction survey, 77% of responding Palco members said they are satisfied or very satisfied with Palco as their FMS provider with a majority of respondents rating its FMS services as excellent and customer service as always respectful, responsive, and clear. The partnership between our offices has produced positive advances for our participants and overall improvements to the health of the program. Palco's key contract personnel participates in and engages with stakeholders on program development and they frequently engage and seek collaboration with our Department staff.

Based on our partnership we would recommend the financial management services of Palco. If I can provide you with additional information, please feel free to contact me at Jessica.Corral@state.co.us or 303-866-3504.

Sincerely,

Jessica Corral

Jessica Corral
Participant Directed Programs Contract Specialist
Office of Community Living

Improving health care equity, access and outcomes for the people we serve while
saving Coloradans money on health care and driving value for Colorado.
www.colorado.gov/hcpf

COA
Council on Aging

4601 Malsbary Road
Blue Ash, OH 45242
(513) 721-1025
(800) 252-0155
www.help4seniors.org

BBB Torch AWARD
2010 WINNER

5/27/2022

Arkansas Department of Human Services
Division of Provider Services and Quality Assurance
P.O. Box 8059, Slot 5427
Little Rock, AR 72203

RE: Letter or recommendation

To Whom It May Concern,

The Council on Aging (COA) in Southwestern Ohio has been working with Palco, as of December 2021, as a fisical intermediary services provider for our consumer directed care clients in our Elderly Service Program (ESP). Based on our partnership and experience working with the Palco team we highly recommend the services of Palco.

The ESP program helps older adults remain safe and independent in their homes by providing senior home care services such as personal care, housekeeping, meals, transportation and more. Participants can choose to self-direct their in-home care by hiring their own workers (aides) to assist them. The Participants utilize the services of a fiscal intermediary who is responsible for all payroll, enrollment, taxes, and customer service tasks related to the self-directed program.

Upon award, Palco completed a readiness review for the program quickly and efficiently through Westchester Consulting. Their competence as an FMS and industry leader were evidenced in this process. In the weeks and months following, Palco leadership and project management team is working diligently with the COA team to prepare for the transition of 500+ members from our existing FMS provider to Palco in accordance with the State and Federal best practices. Palco has collaborated with COA staff for several hours on program onboarding and system configurations to ensure the Palco platform was setup correctly to meet the needs of the COA staff and OH participants. With the Palco partnership, access to robust transition templates, training and implementation plans, and educational materials were accessible to our staff to help ease the transition and make the project less cumbersome.

Additionally, Palco continues to collaborate with COA to implement their services through our agency developed app, AddnAide, to support innovation in how our clients are able to have self-direction in getting their needs addressed.

Council on Aging is designated by the state of Ohio to serve older adults and people with disabilities within a multi-county region. We are experts at helping people with complex medical and long-term care needs, offering a variety of services via publicly funded programs. Our mission: *Enhance lives by assisting people to remain independent through a range of quality services.*

As we approach the end of our implementation phase, Palco makes it a priority to stay on top of the State and Federal laws effecting the overall program health as well as policies and procedures affecting stakeholders. Palco leadership can be counted on to participant in and engage with stakeholders on program development and have been engaging and collaborative with our team. We have enjoyed working with the key leadership team at Palco- Alicia Paladino, Mark Biviano, and Kady Predota, and appreciate their responsiveness. Palco has brought in other team members such as program account managers and enrollment specialists who help make managing the program and communicating on key items successful.

We have appreciated working with the Palco team throughout this implementation phase and we look forward to our continued partnership with them as we move forward. If I can provide you with additional information, please feel free to contact me at (513) 878-2938 or at lportune@help4seniors.org .

Sincerely,

Lisa Portune

Lisa Portune, MSW, LISW-S, CHPSE
Manager, Quality and Compliance
Council on Aging of Southwestern Ohio
4601 Malsbary Rd.
Blue Ash, Ohio 45242
(513) 721-1025 (main)

REFERENCES WITH CONTACT INFORMATION

Pennsylvania Department of Human Services – Office of Developmental Programs
Charles R. Frick
Section Chief, Division of Program Operations
Bureau of Community Services
625 Forster St
Harrisburg, PA 17120
717.783.8751
cfrick@pa.gov

First Data Government Solutions, LP (FDGS)
Grant McKay
Account Executive
255 Fiserv Drive
Brookfield, WI 53045
513.460.8007
Grant.McKay@Fiserv.com

E.3. Work Plan

Palco exceeds the requirements outlined in the Scope of Work of this RFP and provides our Arkansas-specific Operational Policy and Procedures Manual in Appendix 2 as evidence to support the soundness of our operational policies, procedures, processes, and internal controls. We also offer a sample implementation plan as Figure 9 beginning on page 75, while our approach to contract management is described on pages 77-87. Our approach to user acceptance testing is described beginning on page 87, our product release schedule is discussed on pages 88-89, and our approach to EVV is outlined on pages 89-93 with our file sharing and data retrieval capabilities described beginning on page 93. A brief description of Palco's customer support approach is outlined on pages 98-99 with a more thorough description provided in Section E.9. Customer Support.

As the incumbent, Palco mitigates the risk of the unknown. We understand DHS program staff are the experts on your programs. Throughout the years Palco has demonstrated with unwavering commitment to seek the State's guidance when required, providing best in class Self-Directed Financial Management and Counseling consultation when requested, and championing the expansion of self-direction for our home state. In short, we provide a solid foundation to build a work plan toward the future.

E.3.A. Operational Policies, Procedures, Processes, and Internal Controls

Palco created and maintains an Arkansas-specific Operational Policy and Procedures Manual that documents all policies, procedures and processes for VF/EA FMS tasks and requirements outlined in this RFP. Our Operational Policy and Procedures Manual includes descriptions of processes and related internal controls that are used to monitor performance of key VF/EA FMS contract deliverables and demonstrate a thorough understanding of Centers for Medicare & Medicaid Services (CMS), Internal Revenue Service (IRS), U.S. Citizenship and Immigration Services (US CIS), and federal and state Department of Labor (DOL) rules and regulations, as well as state and local tax rules and regulations. The Operational Policy and Procedures Manual was customized for Arkansas and will be updated with best practices or to accommodate changes in program requirements, employment law, or tax codes. We will alert the Department in the event of any changes in these areas and offer solutions for complying with the changes. At a minimum, we review and update our Operational Policy and Procedures Manual annually. We use this manual as a foundational training tool when onboarding new staff dedicated to serving the Arkansas self-direction program.

The Operational Policy and Procedures Manual will be submitted to the Department during the Readiness Review period, for review and approval. Once approved, Palco will update the manual as needed at least annually, and provide all updates to DHS for review and approval. The manual will be available in electronic format. All modifications will be implemented within five (5) business days.

Please see **Appendix 2** for our Arkansas-specific **Operational Policy and Procedures Manual** currently being used.

Palco's internal controls ensure our staff uses, discloses, and safeguards Protected Health Information (PHI) in compliance with the Privacy and Security Rules under the Health Insurance Portability and Accountability Act (HIPAA) and Health Information Technology for Economic and Clinical Health Act (HITECH) of 2009, as well as state law, rules, and regulations. Disclosure of protected health information by the workforce must comply with the requirements stated in the contract and/or Business Associate Agreement under which Palco received the protected health information.

We engage and exceed industry standards for storing and safeguarding PHI, including copies of timesheets, phone logs, summaries of complaints with resolution noted, documentation related to the withholding, filing, and payment of federal and state tax, wages, and year-end tax filings in compliance with federal and state Department of Labor rules. We are committed to reducing waste and harm to the environment; therefore, we store all Participant/Representative, self-directing Employee, and FMS files electronically. This ensures that all records are properly maintained for ten (10) years after becoming fully inactive or until the disposition of court hearings, audits, and appeals are complete.

Further, all Participant/Representative records are maintained for at least seven (7) years and are available for DHS on request.

We also have a comprehensive Disaster Recovery Plan for restoring and preventing loss of data, software, master files, and hardware if management systems are disabled. A copy of Palco's Disaster Recovery and Continuity of Operations Plan will be made available upon award. The Disaster Recovery Plan includes objectives to meet the following provisions:

- Preventing the loss of the organization's resources, such as hardware, software, data, and other information technology assets.
- Minimizing downtime related to information technology.
- Minimizing downtime of the call center.
- Enabling continuation of critical business practices in the event of a disaster.
- Confirming that a secondary location meets all Palco policies and enables business continuity.
- Protecting and securing all data.

We have established a separate, dedicated standby facility in the event the Disaster Recovery Plan is activated to enable the timely return to regular operations without interruption of data and use of appropriate software that is completely up to date as of the previous day's work. The cold site has the capability to meet all Palco's policies, allowing efficient production of key tasks.

Palco's emergency preparedness procedures stem from risk-based assessments provided by the Federal Emergency Management Agency. Internal staff policies and procedures and general office safety features are built around these assessments.

E.3.B. Implementation Plan

As the incumbent, Palco has extensive knowledge and an in-depth understanding of the Arkansas self-direction program and contract requirements. We are fully operational and have the infrastructure in place to continue to meet the expectations set forth in this RFP.

We look forward to our continued partnership and the benefits derived from a:

- ✔ Fully developed web-based enrollment, timesheet entry and submission, and case management portal configured to meet the needs of Arkansas stakeholders.
- ✔ Fully functional and successful EVV integration with FDGS, the state's chosen EVV vendor.
- ✔ Dedicated and knowledgeable Enrollment, Customer Support, and Counseling staff located throughout Arkansas.
- ✔ Established Training team knowledgeable of Arkansas program requirements.
- ✔ Web-based real-time reporting and dashboards; and
- ✔ Devoted Arkansas Customer Support team.

These added benefits as the incumbent will allow the Department and Palco to reallocate the implementation time period to discuss new program initiatives and enhancements that bring added value to Participants/Representatives and their Employees, as well as DHS program staff and other support staff (DHS nurses).

Should DHS/DPSQA seek to expand the self-directed model and make options available to a more diverse population, rest assured that Palco is prepared and experienced in successful transition planning and program implementations.

In recent years we have transitioned programs in states where we were awarded new business. We approach these transitions with a sound transition and training plan, often transitioning these self-direction stakeholders in a compressed period of time. In late 2020, we worked with the State of New Mexico to transition FMS services for three distinct self-direction programs serving over 3,100 participants and 4.400 workers in a period of seven (7) short weeks, and this included the introduction of EVV for these self-direction populations.

Implementing EVV with a self-direction population requires patience, intensive training efforts, and exemplary customer support. During the height of the COVID pandemic, we partnered closely with the Arkansas Department of Human Services to transition 2,842 program Participants/Representatives and 3,559 self-directing Employees to a service delivery model that included Electronic Visit Verification. Our Customer Support Center fielded 50,737 calls over the course of six months, helping to ease anxiety and the fear of change experienced by many participants and their employees. In addition, our Counseling field staff, and Customer Support staff participated in hundreds, if not thousands, of individual support calls with program participants during this transition to EVV. Our collective efforts alongside DHS staff enabled the State to implement EVV as seamlessly as possible.

In early 2021, an FMS vendor abruptly left the State of Colorado and we stepped up to transition the participants and workers served by that vendor in just three months' time. We worked closely with the exiting vendor and State program staff to transition historical program data, performing multiple quality reviews to ensure accuracy for payroll, budget, and tax reporting purposes. This transition created a bifurcated tax year for the transitioning self-directing workers, and our knowledgeable accounting and tax staff handled the end of year reporting requirements with ease.

We are currently undergoing a transition in Ohio, a recently awarded program, and are working with the exiting vendor and program staff to ensure a smooth transition and onboarding process for program participants and their self-directing workers. Ahead of the transition date, we have begun enrolling new program participants and their workers using our web-based enrollment software to allow the program to continue to grow without service disruption or enrollment delays while we work on transitioning existing participants and workers.

Figure 9 provides a sample Implementation Plan we have utilized in past implementations and transitions.

Figure 9: Sample Implementation Plan
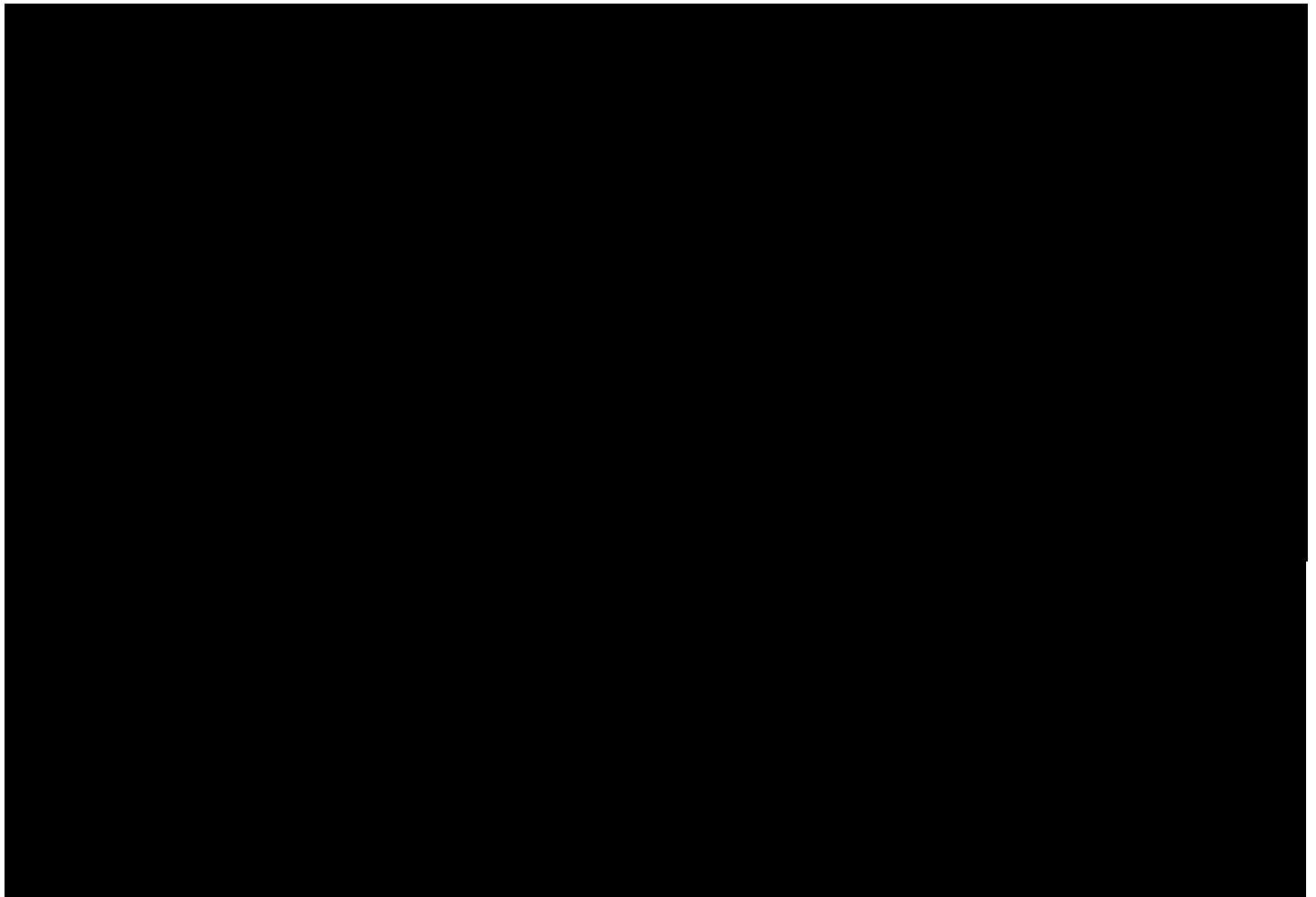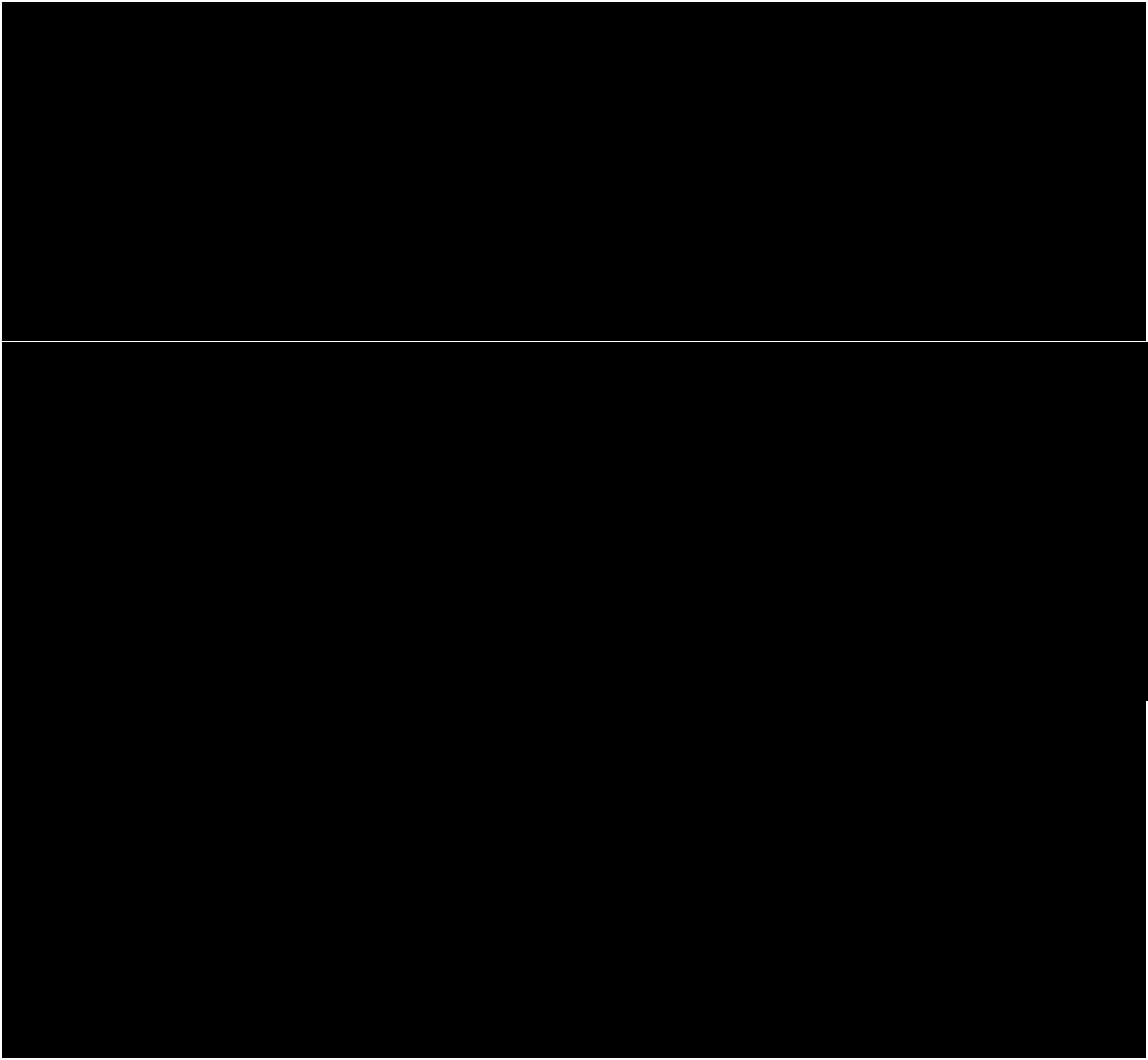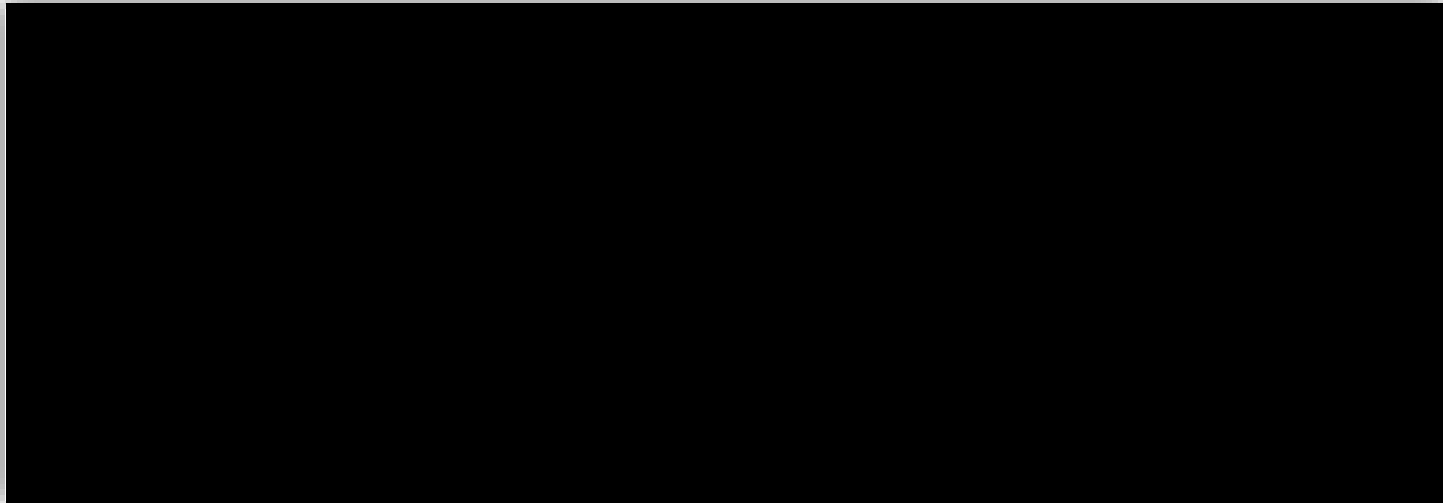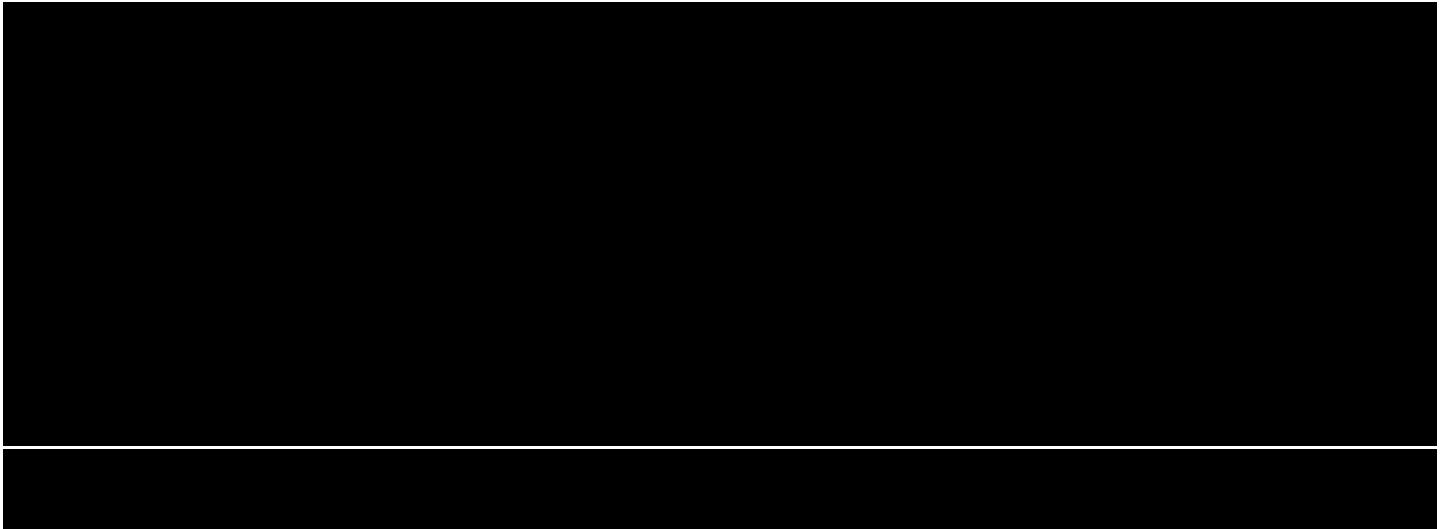
E.3.C. Contract Management

We recognize the success of our partners in their fiscal responsibility and public opinion surrounding implementation, transition, and delivery of program and contractual requirements.

In our current engagement with the State of Arkansas, Palco has demonstrated our commitment to open communications and operational updates through Palco-led conference calls and status reports. We look forward to a continued discussion with DHS and its stakeholders to incorporate new requirements outlined in this RFP. These calls provide visibility into previous weeks' activities and opportunities allowing DHS and Palco staff to effectively address and discuss partnership topics as needed. Items include but are not limited to procedural matters, policy clarifications, reported issues, and EVV-specific items.

We understand rapid, organized, and timely transition decreases the burden on DHS and your program participants.

ENSURING NEW CONTRACT REQUIREMENTS ARE MET

To successfully implement new initiatives and transition new programs or populations, our approach starts with meeting with the Department as soon as possible to confirm program requirements, including any updated standards the Department is requiring to the delivery of VF/EA FMS in addition to the tasks outlined in the Arkansas RFP for VF/EA FMS. To further aid with the program's success, we will cross-reference our understanding with yours with respect to DHS' data interfaces and the operational requirements. Palco respects that DHS program staff are the subject matter experts on your program, and we appreciate that guidance. Our implementation framework is built from years of successful transitions.

We identify the FMS program details through individual sessions on the following topics:

- ✔ Program Setup
- ✔ Enrollment
- ✔ Budget Configuration
- ✔ EVV
- ✔ Payment Validations
- ✔ Billing and Eligibility
- ✔ Notifications
- ✔ System Access
- ✔ Reports

Once all stakeholders have agreed to these written requirements, we convert these requirements into our applications for online enrollment (Intake), electronic timesheet processing (Connect), payroll, and customer support for the DHS waiver and program Participants, Employers, Caregivers, and DHS support staff.

While program specifications, project planning and launch timelines follow a standard waterfall methodology, we internally leverage the Agile development principles, emphasizing individuals and interactions, working products, customer collaboration, and responding to change above other values.

Our internal process starts with understanding customers: who they are and what they are trying to accomplish. It is our orientation/knowledge acquisition (OKA). Some of the tools we use include:

- ✔ Creating Personas or Archetypes, to place ourselves in the shoes of those who will be using our applications. For instance, we will pretend to be a new Participant, Employers, Caregivers or Supports Coordinator and ask ourselves, "Who are they? What do they care about? What energizes them? What frustrates them?"
- ✔ Mapping out journeys, so that we know the exact steps that each persona takes to accomplish a task, such as enrolling in self-direction, creating a budget, hiring a caregiver, reviewing, and

approving payroll, changing personal information during a plan year, and checking utilization of funds against budgeted amounts.

- Writing stories that keep the person at the forefront of our technology. These always start with the who: Who is using this application function, like signing enrollment forms? Then what: What exactly needs to happen so that the process of reviewing, signing, and approving a standard tax form makes sense and remains easy? And why: Why is this important and what is the next step? Finally, when: When X happens (they are interrupted and must come back later to finish), how do we help?

- Leveraging the Agile Sprint, which has become an industry standard now for reviewing technical stories with all stakeholders, product owners and developers, prioritizing the most valuable activities, and showing what we have done as quickly as possible.

- Continuing to learn and change to help us improve every cycle. We embrace ways to be more efficient, listen and understand our customers more effectively, and deliver more innovative, valuable solutions each year.

We welcome as much interaction as your team wants, whether it be a formal review of written requirements, or a casual check-in over a video call to show DHS program staff the latest and greatest.

As system development and configuration are completed, we provide demos for key stakeholders to collect feedback and verify satisfaction. This plays an integral role in the implementation process leading up to go-live.

Palco is also committed to making investments in usability feedback services that help us identify and improve user experiences through click heat maps, time-to-complete task metrics, and direct user interaction for new features. See **Figure 10** for an overview of the Palco Product Development Flow.

Figure 10: Product Development Flow

We understand rapid, organized, and timely transition decreases the burden on DHS and your program participants.

We also make available a sandbox test environment that allows stakeholders and future users the ability to log-in and have hands-on experience using the applications – without the risk of altering real participant data or exposing sensitive personal and medical information unnecessarily. This environment allows the following activities:

- testing user logins and permissions set-up for program roles.
- walking through the enrollment process for Participants, Common Law Employers and DCWs, from basic demographic information to signing key forms online.
- creating budgets and approving service justifications.
- managing vendor information and program assignments.
- viewing timesheets and payables.

- checking utilization against budgets.
- running reports and downloading data.
- entering and approving DCW timesheets; and
- viewing payments and paystubs.

Palco will designate a project team to direct all required functions to carry out the Implementation Plan. The implementation project team will be comprised of individuals with experience in Financial Management Services, including enrollment, payroll, and customer support. Our implementation process lessens impacts and keeps the project on schedule. Palco will fully cooperate with DHS in a Readiness Review, conducted prior to the onboarding of new waiver populations, or requested changes to system functionality.

We will work closely with DHS program staff to define project management, status reporting standards, and communication protocols to ensure an orderly transition/onboarding of new waiver participants and prevent interruptions or gaps in services. We will also establish at least weekly meetings with the DHS team and the incumbent vendor, when applicable, to discuss action items, data transfers, roles and responsibilities, and timeframes for completion of various activities. We currently utilize a transition checklist that includes all key data points needed for a successful implementation. Information we typically request includes, but is not limited to, the following:

- Medicaid Individual, Representative, and Employee demographics and tax IDs
- State and federal income tax and unemployment tax withholdings, filing, and deposit histories
- Garnishments, liens, and other withholding histories
- Patient Pay deductions
- Employment eligibility information
- Arkansas new hire reporting
- Background check results
- Medicaid Individual and employee hire packet information
- Paid, denied, and pending timesheets
- Payroll history reports
- Service Authorization and utilization reports
- Pending grievances, including Department appeals and hearings
- Pending fraud and abuse referrals

Palco will develop the agenda for these meetings, while also being sensitive to the needs and requests of Department stakeholders. At the conclusion of transition planning meetings, Palco's project management lead will prepare and distribute meeting minutes and assign and follow-up on applicable action items.

We will ensure that participants and program stakeholders do not experience any adverse impacts from the transfer. We have led many transitions during our time in this industry and will build upon our existing experience to ensure a smooth transition if new waiver programs embrace the self-direction service delivery model.

DEDICATED STAFF TO MONITOR CONTRACT DELIVERABLES

We have a Contract/Account Manager solely dedicated to the Arkansas program/project to ensure we continue to meet the requirements outlined in this RFP. The Contract/Account Manager serves as the liaison between DHS program staff and other Palco departments. The Contract/Account Manager is responsible for overseeing the day-to-day operations of this contract, working closely with management staff in enrollment, counseling, customer support, payroll, billing, and product management. Collectively these staff attend weekly, internal program meetings to review processes, troubleshoot issues, and brainstorm solutions while also reviewing and reporting on key contract deliverables and quality metrics. Action items resulting from these weekly interdisciplinary team meetings are monitored for timely resolution.

The Enrollment Services and Training Manager and the Director of Customer Support (call center) both utilize an internal, web-based tracking tool to measure key quality metrics to ensure expected contract deliverables are met. For Enrollment, these metrics may include length of enrollment from point of DHS referral, timely outreach, paperwork processing time, total length of enrollment, etc. For Customer Support (call center), these metrics may include speed to answer, hold time, number of abandoned calls, percentage of calls returned within one (1) business day, etc. The Contract/Account Manager also responds to DHS requests, complaints or grievances expressed by program stakeholders, and prepares monthly, quarterly, annual, and ad hoc reports.

WEB BASED PORTAL OFFERING TRANSPARENCY

Additionally, Palco's web-based Case Management Portal (CMP) is the cornerstone to our ability to provide transparency to DHS program staff with real-time participant-related data and program business rules. The CMP provides a comprehensive beginning to end, detailed view of case (participant, representative, or employee) information, budget utilization, payroll history, on-demand reporting, and more.

Palco's CMP provides a detailed view of a Participant's journey from Intake to monthly budget management – and so much more. Users attain dynamic case handling tools for real-time contextual case management access and processing information.

DHS gains visible and actionable access to an audit trail of all system and user actions including the application of different tax rates for self-directing Employees, budget allocation logic (Annual, Monthly, Daily), active and inactive eligibility checks, automatic alerts sent directly to DHS program staff on topics that range from general program information to enrollment information to critical payroll information, and more. In addition, extensive standard reports are immediately available with

the capability of creating customizable reports. Palco's collaborative self-directed case management tool allows all users to be informed of the real-time status of individual cases allowing multiple departments to work simultaneously without redundancy or conflicts.

DEDICATION TO CONTINUOUS QUALITY IMPROVEMENT

Palco relies on the Plan-Do-Study-Act (PDSA) model to evaluate new processes and engage in continuous quality improvement throughout the organization and the lifetime of the contract. The PDSA model provides a mechanism to evaluate new processes, new programs, or new systems by guiding the user through planning the change (Plan), implementing the change (Do), observing, and learning from the implementation (Study), and determining what modifications or improvements should be made to the process or program (Act). This model is cyclical so that organizations regularly engage in a thoughtful and purposeful evaluation of processes, programs, or systems leading to continuous quality improvement.

Palco utilized the PDSA model while working with DHS to troubleshoot and improve our EVV compliance rate during the spring of 2021. We worked closely with DHS program staff, reviewing EVV registration rates and training completion, brainstorming promising solutions to common stakeholder issues, and evaluating the outcome of those solutions. We collectively worked through multiple scenarios and potential solutions in a collaborative and iterative sequence while also relying on this evaluation framework to study our approach and expected outcomes.

As part of our internal controls and quality assurance (QA) measures, we perform quarterly operations reviews of all key deliverables. We conduct monthly QA assessments, including a 15% sample of key operations. Some examples include, but are not limited to:

- Completion of employer enrollment paperwork.
- Completion of worker enrollment paperwork.
- Completion of employer enrollment activities, such as obtaining a FEIN and assigning appointment of agent.
- Completion of worker enrollment activities, such as background checks.
- Completion of employer termination activities, such as revoking a FEIN and IRS and state appointments of agent.
- Timesheet review status, including following a timesheet life cycle from submission to payment.
- Payroll payments made.
- Other payments made, such as tax deposits and filings, garnishment payments, refunds to the Department, and any payments to vendors.
- Bank activity, including payments and deposits.
- Call center activity, including call monitoring and metrics analysis by agent.

Quarterly, the following additional information is also assessed:

- ✔ Filing of quarterly IRS Form 941
- ✔ SUTA tax filings and payments.
- ✔ FUTA tax payments.
- ✔ HIPAA, Privacy, and Security compliance assessments.
- ✔ IT Security assessments.
- ✔ Disaster Recovery Test results.
- ✔ Filing of annual IRS Form 940 (Fourth Quarter review only).
- ✔ Filing of annual IRS Forms W-3 and W-2 and state counterparts (Q4 review only).
- ✔ Filing of any annual state income tax withholding reconciliation reports (Q4 review only).

Quality assurance is built into all our processes see **Figure 11** Palco's Quality Improvement Framework. We rely on effective communication and resource and contract management, while measuring staff productivity to ensure we are meeting the expected performance outcomes. Using the Plan-Do-Study-Act model, we quickly adapt and adjust our processes using the built-in feedback loop for continuous quality improvement.

Figure 11: Quality Improvement Framework
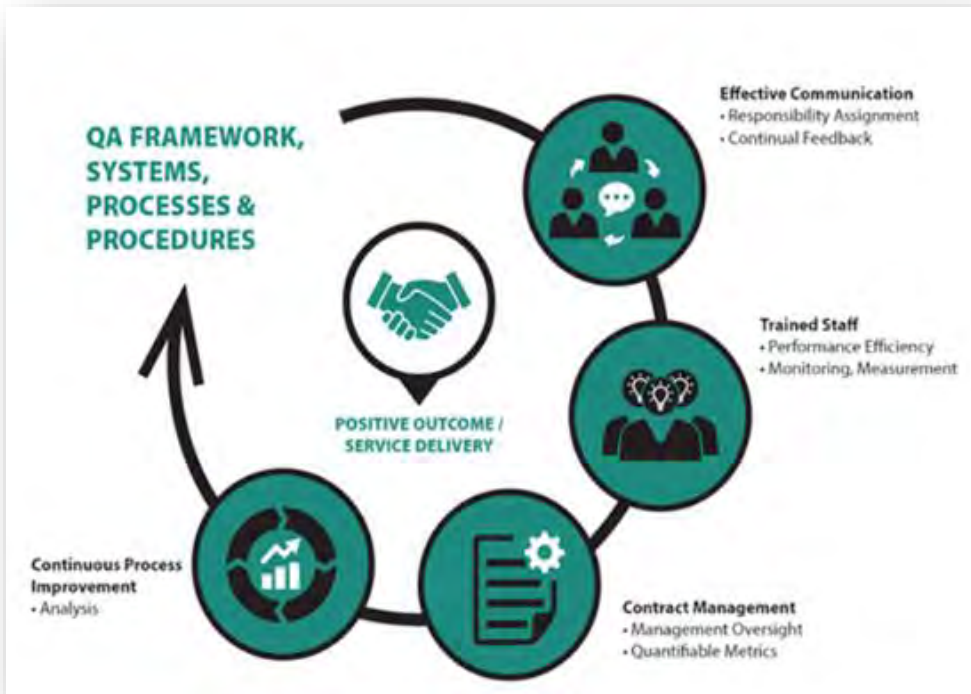
For example, enrollment of Participants/Representatives and their Employees can be a cumbersome and lengthy process, and we strive to mitigate that through analytics. Thus, to monitor this process, we utilize the following:

- An electronic checklist to log key dates and events, follow-up activities, and receipt of forms.
- Benchmarking standards related to average time between the referral and enrollment.
- Monthly case review of pending enrollments and enrollment statistics.
- Incorporation of any changes to the enrollment process based on data trends.

Our Customer Support Quality Assurance program was developed to ensure that our call center staff are meeting all contract requirements and Palco expectations. We record all incoming calls and review a 10-15% sample of these calls monthly for quality. These call recordings and QA reports will be provided to DHS program staff as requested. We also conduct weekly live call monitoring of our call center staff. This includes utilizing a standardized form to ensure that agents engage the proper soft skills (greeting, closing, hold-placement), are knowledgeable and courteous, resolve the issue at hand, follow HIPAA guidelines, and meet company expectations. Each agent is given a QA score based on these activities every month, and the QA score is reviewed alongside the agent. Recorded calls are stored for 30 days.

Our Client Relations Management (CRM) tool allows call tracking and reporting including an electronic record to generate a synopsis of all calls and to provide a complete audit trail of communication to the Customer Support Center from all parties. Additionally, we have the capability to structure the IVR in a manner that allows calls to be monitored by a third party, for the purpose of evaluating call center performance.

Our internal reports used for contract management include all measures of contract performance, including the following:

- 100% of all inbound and outbound calls are documented and maintained in our CRM.
- Fully operational and accessible agents during the timeframe required by the contract.
- 95% of monthly inbound calls are answered within 3 rings or 15 seconds.
- 100% of voicemails, callback requests, and inquiries are returned within one (1) business day.
- Abandoned calls do not include dropped calls.
- Monthly abandoned calls represent 5% or less of incoming calls, regardless of queue placement.
- Call queue wait time does not exceed five (5) minutes, regardless of queue placement.

We will provide detailed weekly, monthly, quarterly, and annual cumulative data to DPSQA when requested. Data will reflect trends using tables, charts, or graphs. Our typical suite of reports includes the following data points:

- Number of incoming calls

- Number of outbound calls
- Number and percentage of calls received by subject
- Number of calls routed to voice mail
- Return call requests
- Percentage of calls returned within one (1) Business Day
- Number and percentage of answered calls
- Average speed to answer
- Average and maximum talk time
- Number of outbound calls (voice and IVR automated)
- Number and percentage of calls abandoned, average time to abandon, maximum abandonment times
- Number of calls in the queue, average queue wait time, maximum queue wait time
- Number and percentage of first call resolutions
- Number and percentage of escalated calls beyond the customer service representative
- Number of individuals requesting specialized assistance

We will provide ad hoc reports as requested. **Both the CRM and GoTo are integrated, giving us the ability to retrieve reports and call metrics on short notice**. We report all critical system outages or incidents to DHS program staff immediately, along with additional information about the source of the issue, proposed resolution, and resolution timeline.

We are proactive in addressing issues. During a call surge, we route 100% program surge calls to 80% of Customer Support Representatives. Our response time is outstanding, earning us high marks from our existing partners. According to a 2020 Customer Satisfaction survey, Palco received a 98% approval rating from Employers and 97% from Employees on the programs that we serve.

During the inception of Electronic Visit Verification (EVV) in spring of 2021, Palco supported the DHS project implementation by allocating resources to increase staff in the call center for 6-8 weeks. This increased allocation of resources was critical to the success of the project for stakeholders. The Palco Customer Support Center provided education and technical assistance daily to stakeholders to ensure the adoption of this new technology was successful and as minimally impactful as possible. During this time, the Palco Customer Support Center absorbed an increase of calls by 48% which we handled with ease ensuring wait times, while slightly increased, never exceeded a threshold of 9 minutes. Manageable weight times paired with a live and knowledgeable specialist to assist stakeholders is the foundation of our Customer Support team.

In addition, during this critical EVV implementation juncture Palco worked with DHS program staff to execute a contract amendment quickly to deploy additional Counseling (commonly referred to as Support Coordination) resources into the field to provide one-to-one, in person support for all

participants learning about the new EVV mandate and the state's chosen EVV solution, AuthentiCare. Over 2,000 face-to-face visits were completed within a 6-8 week period. This level of partnership and enhanced support proved beneficial during this implementation and provided strong evidence of Palco's skilled contract management and commitment to the continued success of this program.

Figure 12 reflects our Arkansas-specific Customer Support Center's annual April call volume from 2019-2022.

Figure 12: April Call Volume by Year
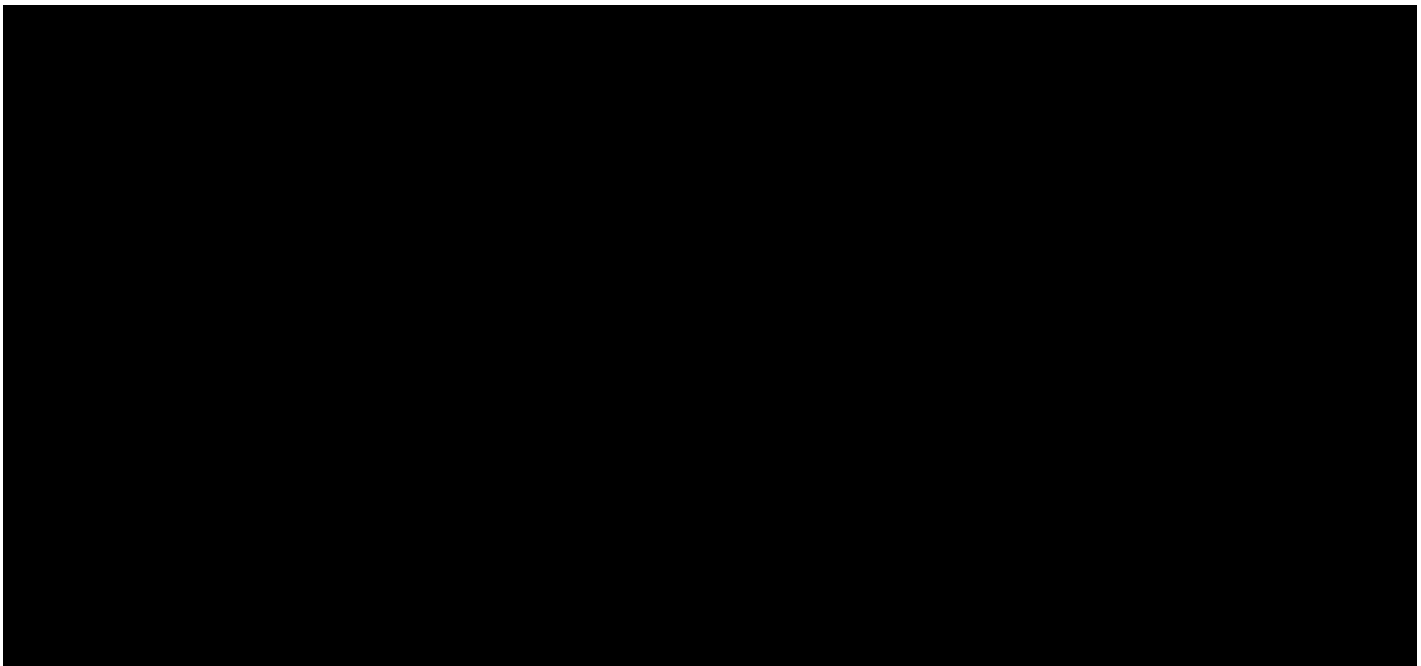
E.3.D. User Acceptance Testing

As system development and configurations are completed, we conduct User Acceptance Testing (UAT) and provide demos for key stakeholders to collect feedback and verify satisfaction. This plays an integral role in the implementation process leading up to successful go-live or transition.

Prior to releasing the application into production, staff will participate in a cycle of UAT. In this phase, a user or group will represent a cross section of end users testing the application. UAT is performed using real-world scenarios that are relevant to end users.

Palco develops detailed test cases/scenarios. These detailed test cases/scenarios allow the test user or group to navigate all functional aspects of the system and confirm performance in accordance with expected behavior and agreed upon requirements. The in-house Palco product management and development team will provide support throughout this process, which includes answering questions, researching issues, executing corrections, and retesting software components.

Once the application produces the expected results, Palco will determine a production release date.

In addition, we utilize a sandbox test environment that allows stakeholders and future users the ability to log-in and have hands-on experience using our applications – without the risk of altering real participant data or exposing sensitive personal and medical information unnecessarily. This environment allows the following activities:

- ✔ Testing user logins and permissions set-up for program roles
- ✔ Walking through the enrollment process for Participants/Representatives and their Employees, from basic demographic information to signing key forms online
- ✔ Creating budgets and approving service justifications
- ✔ Managing vendor information and program assignments
- ✔ Viewing timesheets and payables
- ✔ Checking utilization against budgets
- ✔ Running reports and downloading data
- ✔ Entering and approving caregiver timesheets
- ✔ Viewing payments and paystubs

E.3.E. Product Roadmaps and Releases

Palco follows the Waterfall Methodology for project planning, release timelines, testing, and training, but we leverage the Agile Methodology for more of an iterative/sprint approach. This approach has an emphasis on individuals and interactions, working products, customer collaboration, and responding to change above other values. Our development workflow phases are:

Discovery: Identifying and understanding our customer's requirements and needs.

Story-Writing and Prioritization: defining the customer needs and requirements, what they are trying to do, and what's most valuable/priority.

Development Sprints: defining the length/time of each iteration/sprint and identifying which stories will be developed. Our focus is to collaborate, show value quickly and stay flexible if there are any project changes.

Review and Launch: This is our testing phase. We perform System Integration Testing, Regression Testing and User Acceptance Testing. When testing is completed and signed off, the new functionality is deployed.

As system development is happening, our training department is preparing for the launch of the new functionality or enhanced system features by completing the following activities:

- ✔ Product release notes are being created and will be communicated to all Palco and DHS program staff members.
- ✔ Training materials are being created or updated.
- ✔ Training schedules are being created for Palco and DHS program staff.
- ✔ Participants/Representatives, and their Employees.
- ✔ Communication email is drafted to Participants/Representatives and their Employees.

- Palco's Arkansas Operational Policy and Procedures Manual is updated.
- Palco's Arkansas, program-specific website will be updated with new materials and updates.

Wherever program Participants/Representatives and their self-directing Employees are located, we have a friendly Palco team member nearby and ready to train, educate and assist when needed.

Palco places a great emphasis on training and education in all aspects of our business, both internally and externally, as evidenced by our dedicated in-house training team of self-direction experts. We offer virtual instructor-led online training courses where participants can ask questions in real-time, as well as in-person, individualized training offered throughout the state. We rely on our Arkansas-based Counseling field staff who are located geographically across all regions of the state. We also offer a "Sandbox" training environment to provide hands-on training with real-life scenarios. These training options provide various learning formats to ensure the best possible training experience for program stakeholders.

E.3.F. EVV Product(s) and Support

DHS, Palco, and FDGS have partnered to provide an Electronic Visit Verification solution that meets the demands of the 21st Century Cures Act and the Arkansas self-direction program. Our connection is battle-tested and as the FMS provider for the Arkansas self-direction program, we approached the Arkansas EVV transition equipped with multiple successful state EVV implementations, an integrated cloud-based architecture and EVV support software called Connect, and a streamlined process to increase the efficiency and outcomes of the EVV implementation for the State and their self-directing program participants. Along with FDGS, the state's chosen EVV vendor, we worked with DHS to modernize deliverables, decrease errors, and increase efficiency. Palco has a strong history of successfully implementing EVV with the State's chosen EVV vendor and EVV solution, AuthentiCare.

AN EVV SOLUTION FOR THE 21ST CENTURY

Palco's integrated solution for EVV utilizes a near real-time, secure claim web service Application Programming Interfaces hosted by FDGS, Palco's partner and the State's chosen EVV vendor. We currently work with FDGS in five states including Arkansas, Pennsylvania, New Mexico, Colorado, and Kansas. We have an established and successful partnership with FDGS and their leadership team, including Grant McKay and Jonathan Mills. Together, with these skilled partners, we have earned the trust of thousands of self-directing participants and their employees.

Palco is uniquely positioned with AuthentiCare®, the State's chosen EVV solution, to preserve the existing DHS' EVV solution that meet DHS' unique business needs: remaining compliant with the 21st Century Cures Act, a fully integrated Software-as-a-Service (SaaS) model and keeping proven security controls in place to maintain system backups that meet or exceed industry standards. Our solution and approach get you where you need to go in the most effective and efficient way with strong collaboration with your EVV stakeholders.

The service, which has been in production for five years in other states where we provide Financial Management Services and in production in Arkansas for over a year, is used to retrieve visit geolocation and services in near real time as check-ins and check-outs occur. The web service integration results in a streamlined claim lifecycle with improved monitoring and faster billing submissions that allow for a high-quality user experience and quality assurance.

This partnership provides DHS seamless integration of services, plus the addition of a statewide support team who understands the intricacies of the Arkansas self-direction program and stakeholder needs. The Palco Connect online time entry portal integrates seamlessly with the AuthentiCare EVV product, allowing the Palco team to provide a complete one-stop solution for Arkansas Participants/Representatives and their Employees, by way of EVV compliance, service monitoring, timesheet submission and payroll and payment processing.

Data stored on the individual's device is limited to information related to the worker and may include:

- Participant's address
- Participant's phone number
- Date and time of the scheduled visit
- Participant names for whom caregivers may provide service for an offline, unscheduled check- in
- Visits captured while offline that are pending upload to AuthentiCare. This data is deleted upon upload.

FDGS and Palco use the following means to secure the user's device and software solutions:

- Data noted above is encrypted while stored on the device
- Access to stored data is available only with the worker's username and password
- Caregivers are authenticated into the app with username and password (something you know) and a device ID on file with AuthentiCare (something you have).
- This multi factor authentication is required at least daily and each time the caregiver logs out or shuts down the app.
- The app locks after 15 minutes of non-use
- Username and password are required to access after timeout locking
- After the phone is locked, username and password are required to access the app
- NIST based password policies are in place

During the height of the COVID pandemic, we partnered closely with the Arkansas Department of Human Services and FDGS to transition 2,842 program Participants/Representatives and 3,559 self-directing Employees to a service delivery model that included Electronic Visit Verification. As part of this transition, Palco's dedicated Training team and Counseling field staff led the EVV implementation training efforts by providing virtual, instructor-led group training opportunities for stakeholders. In addition, our Counseling staff and Customer Support staff participated in hundreds, if not thousands,

of individual support calls with program participants during this transition to EVV. Over 2,000 face-to-face visits were completed within a 6-8 week period. This level of partnership and enhanced support proved beneficial during this implementation.

Implementing EVV with a self-direction population requires patience, intensive training efforts, and exemplary customer support. Our Customer Support Center fielded 50,737 calls over the course of six months, helping to ease anxiety and the fear of change experienced by many participants and their employees. Our collective efforts alongside DHS staff enabled the State to implement EVV as seamlessly as possible.

We have integrated our FMS and Case Management software to store and retrieve data from AuthentiCare, the state's chosen EVV solution. Working closely with FDGS, we have built an application programming interface (API) to provide a consistent, reliable, and secure data exchange mechanism so that visit data or shifts captured in AuthentiCare are pulled into Palco's electronic timesheet software (Connect) for payroll processing. In Palco Connect, Participants/Representatives and their self-directing Employees view their EVV shifts as an electronic timesheet, allowing them to review their shifts for accuracy before submitting for payment. Only shifts with all six CMS-required data elements are imported into the Palco Connect system.

- If an Employee makes a mistake in AuthentiCare, they use Palco Connect to make a correction to their timesheet before submitting to Palco for payment.
- If an Employee forgets to capture their shift in AuthentiCare, they use Palco Connect to manually enter their shift and note the reason why they are having to do a manual entry.

This integration is extremely unique to the Palco-FDGS partnership and provides Participants/Representatives with a systematic approach that is seamless and does not require the use of multiple user interfaces.

To support this EVV implementation for Participants/Representatives and their Employees, we developed an EVV Resource Manual tailored to the Arkansas self-direction program and our partnership with FDGS. See Section E.10 for Education and Outreach.

"Without being able to hire our own caregiver, we would have to put my dad in a nursing home. I would give the support coordinator, Sabra, 15/10 stars. She has been there every step of the way and we are so appreciative of her help along the way. Palco has helped us through learning EVV and are always available when we have questions. This program is fabulous and has kept my dad happy and able to stay in the home with us. He is able to still go places with us and enjoy life. Customer service has been great any time we had to call in for help and has even called me to check on us. It is rare that you find a company with so many employees that are so happy to help and always friendly. I could not be more thankful for Palco."

- Richard C. from Arkansas (Used with permission)

FDGS' Innovative Mobile App Approach

The most innovative features are provided through FDGS' AuthentiCare Mobile application, offering flexibility for continuous collection of visit information in rural Arkansas locations that may not have cellular connectivity. The mobile app has two modes for connectivity for caregivers: Standard and Frontier. Frontier mode overcomes connectivity issues found in rural areas. Workers use the mode that best fits the connectivity options in their area.

Self-directing Employees install the free mobile app on their own phone or tablet and use it to check in and check out when providing care. Sample screen shots are included in **Figure 13** below. The system uses the device's network time and GPS location to verify the start and end times of the visit and the location of service in real-time. Visit information is stored on the device until the worker has Wi-Fi or cellular data coverage, and then the data are automatically uploaded, providing a paperless solution.

In limited-service areas, the AuthentiCare mobile application provides Store and Forward technology features. In contrast to other vendors, the AuthentiCare Store and Forward solution uses the mobile device's network time and GPS location services for EVV, rendering a fixed device unnecessary. Even in the limited-service areas, GPS location will be captured so service locations is validated.

In addition to integrating with the State's chosen EVV vendor, Palco has utilized the same EVV solution (AuthentiCare) with our Counseling field staff. This enables us to track staff productivity as well as deter the mismanagement of Medicaid funds. Implemented in 2017, Palco leadership found ways to assist our busy field staff with the task of tracking and capturing visit start and end times as well as tasks completed for adequate billing and claims processing. We implemented EVV and made it a requirement of our Palco Counseling field staff years before the 21st Century Cures Act was a mandate. Palco staff are trained users of EVV from day one of employment and quickly become subject matter experts prepared to train their participant caseload because they too are using the application for their daily functions.

We relied on lessons learned during the three (3) years preceding the Arkansas EVV implementation to position ourselves as knowledgeable, subject matter experts as Arkansas readied itself for implementing EVV for their self-direction population. Because of our previous EVV implementation

experience and unique partnership with the state's chosen EVV vendor, we proved to be a key partner in the Arkansas EVV implementation project. Palco staff were well versed in the areas of the AuthentiCare application, the state's chosen EVV solution, that would require special configuration and programming to meet the needs of a self-direction population and the Arkansas program. As a valued partner, Palco staff collaborated with DHS to share these lessons learned to help ensure a smooth implementation for the self-direction population.

E.3.G. File Sharing and Data Retrieval

EXPERIENCE INTERFACING WITH ARKANSAS DHS SYSTEMS

Currently, Palco uses an application programming interface (API) to send and receive EVV data from multiple vendors in Arkansas as well as other states/programs. In Arkansas, a few unique data feeds are utilized to generate and manage user access to the system. As the self-directing Employee is assigned a Provider Identification Number (PIN) by the State of Arkansas, that PIN is housed within the Arkansas MMIS (managed by Gainwell) and fed to AuthentiCare (managed by FDGS). Palco also houses this PIN for every self-directing Employee within the Palco Case Management Portal (CMP) and utilizes it as a synchronization point between AuthentiCare and Palco CMP.

Several APIs work together to create user system access. Those feeds include:

- **Authorization Feed** which ties the Participant, Employee, and the services the Employee is authorized to provide together. It also ties the self-directing Employee to the Palco provider account.
- **Employer Feed** which ties the Participant and Employee to the self-directing Employer. This feed also ties the Employer to the Palco provider account.

Palco has the capability to integrate with any external system or application, using a Job Queue application that runs backend jobs on demand or on a set schedule. For example, to meet the demands of the 21st Century Cures Act, Palco integrated with the state's chosen EVV vendor (FDGS) for Employee time entry. Palco worked closely with FDGS and DHS to ensure a successful EVV integration in Arkansas.

Should the need arise, we will build customized jobs, including APIs, to integrate with external systems via various data transmission protocols such as SFTP, web services APIs, and REST APIs.

We have a successful history of technology integration and the cohesion of supporting architectures with DHS as well as other states and managed care organizations. In every instance, Palco has a functioning team and resources in place that are well-versed and committed to successfully meeting applicable DHS and CMS standards.

Palco also has the ability to provide data to the state's EVV system via adjudicated application programming interfaces (APIs) to report on the status of timesheets (paid/rejected), as well as billing and claims data.

We successfully interface with the Arkansas Medicaid Management Information System (MMIS) to support our billing functions for Counseling (Support Coordination). Prior to claims submission, comparisons and reconciliations are conducted to ensure we are billing the correct amount and that payment is not made for services provided to ineligible individuals or for services that are not authorized.

To preserve the ability of the architecture to exchange data efficiently, effectively, and appropriately with other organizations in the health and human services enterprise we use object-oriented modeling language in all Palco applications.

EXPERIENCE INTERFACING WITH OTHER STATE SYSTEMS

In other states where we provide financial management services, we interface with state MMIS' to support our billing functions.

- Prior to billing submission, eligibility is checked via 270/271 files to ensure that the participant is eligible for services prior to payment. This is a helpful process in reducing billing for periods of ineligibility, such as hospital stays or utilization of other services.
- Service data from timesheets is compared to both established wage ranges and the budget.
- FUTA and SUTA thresholds for caregivers are checked against the general ledger to ensure that we bill the proper rate. If the caregiver has exceeded applicable wage thresholds, the rate billed will be reduced.
- Any goods and service payment requests are compared against established billing rates and the budget.
- Statuses during the period are checked against potential claims to ensure that the Employer did not receive services during "ineligible" periods, such as hospital stays. We have established processes for determining when a participant is admitted to a nursing facility or hospital, and the length of stay, or otherwise engages in any other activity that would render them ineligible for billing purposes. We train on self-reporting and False Claims provisions during the Participant/Employer orientation and maintain touchpoints with DHS and Supports Coordinators to ensure that we are notified of any changes in eligibility or status that could impact claims.

Daily eligibility checks via 270/271 files ensure that the participant is eligible for services prior to payment.

Service data from timesheets is compared to both established wage ranges and the budget. Unique employer tax rates are applied. FUTA and SUTA thresholds for self-directing Employees are checked against the general ledger to ensure that we bill the proper rate. If the caregiver has exceeded applicable wage thresholds, the rate billed will be reduced.

After 837 claims are submitted, we receive a Remittance Advice, translate it, and import it into our Case Management Portal (CMP). If the claim was not paid, we determine the cause and resubmit if

necessary. Our system is seamless on the backend, which enables us to send claims in large batches and receive large response files. Because everything is automated, adjustments happen quickly to resolve any billing disputes.

To conduct eligibility verifications, we first compile the data from our case management software and submit to our secure billing and eligibility software, which helps us create Medicaid eligibility files to ensure that the participant is eligible for services prior to billing. When files are received back, they run through a third-party software system, which acts as a translation service, and provides us with the information to know whether an individual is eligible for services. This allows us to block off time during ineligible periods in our system, so that the Participants/Representatives and their Employees cannot submit time for ineligible periods.

Eligibility verifications are typically done daily, but can be on a less frequent schedule, as agreed upon. We recommend that the checks be done at least prior to payroll. We also recommend that the checks include all individuals – not just individuals who are limited to submitting timesheets as this will help ensure that time is blocked off from entry. We have experience conducting these eligibility verifications via batch transfer according to the flowchart in **Figure 14** below.

Figure 14: Claim Creation and Submission Flow Chart
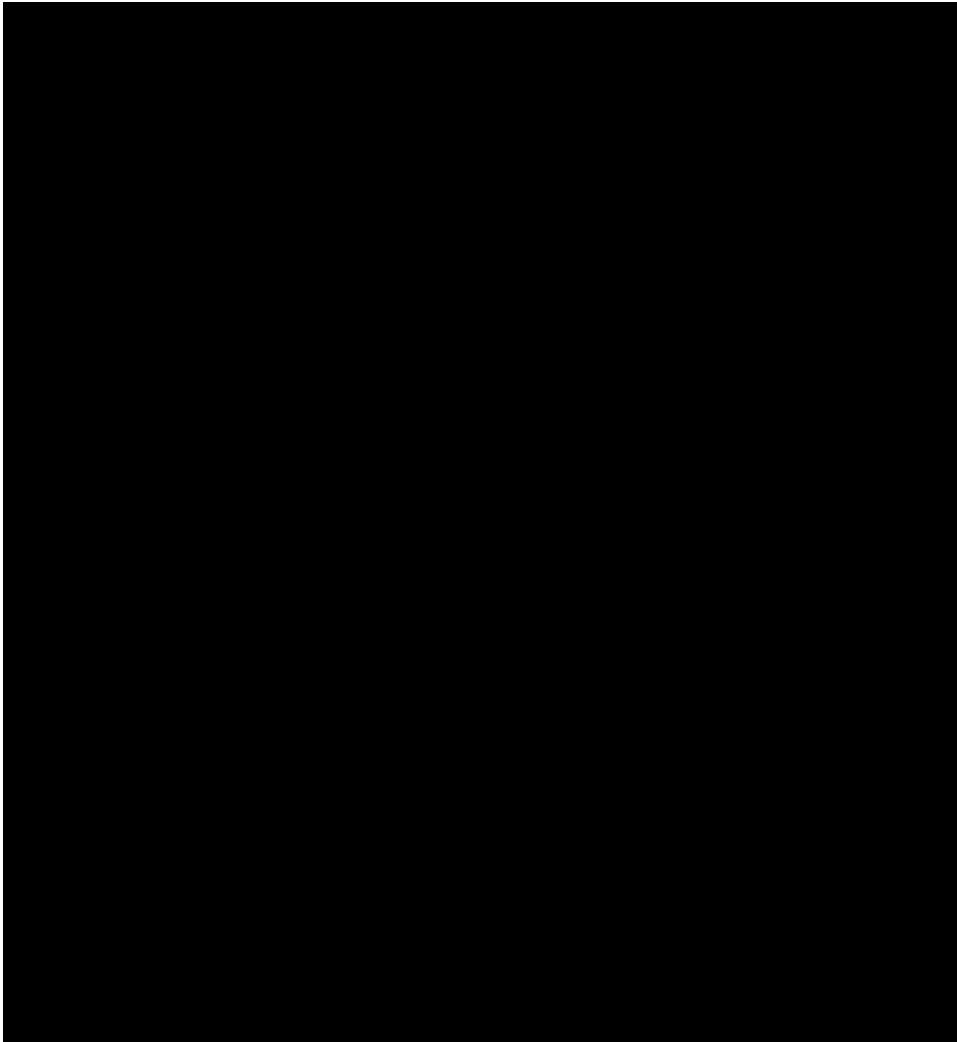
Once those files are received, timesheet data that should be paid to the Caregivers are converted into a payroll encounter claim, or 837 claim, and sent to the Medicaid Fiscal Agent. Our systems are embedded with a combination of controls that perform cross-checks and calculations to prevent over-billing of service hours or goods and services.

All claims are submitted in accordance with the participant's budget and billing requirements. Here, it will be assigned an Encounter Processing Solution (EPS) Transaction Control Number (TCN). The system applies a series of compliance and validation rules to verify the integrity and quality of the submitted encounter data.

We accept claims files in a variety of ways including downloads from the department's EDI gateway. We house a variety of information related to claims, including a Media Control Number (MCN).

When we receive funds from Medicaid, we generate a report that compares them with funds authorized on the budget and funds billed. When claims are denied, our billing department adjudicates, corrects,

and resubmits them. They are re-submitted using the standard 837P adjustment and reversal transactions within 30 days of the original payment paid date. Non-compliant files or transactions will be reviewed, adjusted, and returned for processing within the same payroll cycle. If a billing error occurs, Palco takes the appropriate action, which may include making refunds to the state. If necessary, we will bill the Employer directly or work out a payment plan should their claims exceed authorized amounts. When participants exceed authorization caps, we will take the appropriate action to either reject the payment, contact the Department, or other action as deemed necessary by the state. We will provide a demonstration to the Services Coordinator Organizations (SCO) on the process.

Palco will also process our fees in accordance with the Department's billing requirements. This includes the following, using the same flow as in the figures above:

- Per Member Per Month (PMPM) payments.
- Payroll payments reimbursement.

To ensure quality, we will review a billing sample on a quarterly basis and trace it through the accounting system to payment and billing. Our banking and accounting controls include the following:

- Proper segregation of duties is engaged through the payroll process with operations separated from reconciliations, for example.
- Reconciliations are performed on a continual basis to ensure quality. It includes comparing hours of services billed and paid, a review of items left to be paid, reviewing records for accuracy and completeness, and investigating discrepancies.
- Maintaining billing records for internal audit purposes that verify amounts of claims and support claims (e.g., Budgets, correspondence from the Department, etc.).

Any remaining participant funds will be returned to the State at the end of the fiscal year.

We currently include budget files, 835, 837, 270, and 271 files individually and in batch format. We are more than happy to undergo a testing phase before allowing production files to be posted. As always, we welcome the opportunity to explore these systems and make recommendations on how to create efficiencies with data sharing.

In addition to claims, Palco can provide an adjudication status for every shift via our application programming interfaces (APIs) that report on the status of timesheets (paid/rejected). This synergy with the State's chosen EVV solution provides real-time reporting and oversight for DHS program staff as well as data for key performance indicators as outlined by the Centers for Medicare and Medicaid Services (CMS). This integration is extremely unique to the Palco-FDGS partnership and provides Participants/Representatives with a systematic approach that is seamless and does not require the use of multiple user interfaces.

We provide an accountability system including quality indicators, performance metrics, and methods for monitoring key indicators:

- ✔ Internal processes that ensure all areas of operations, including caregiver eligibility and status, employment practices, tracking participant's budget funds and spending plan activity, verifying accuracy of timesheets, ensuring payroll accuracy, monitoring billing and claims submissions, and preventing, detecting, and reporting known or suspected incidents of fraud and abuse.
- ✔ For each activity, there are target objectives, risks, and related quality initiatives.

Performance metrics assigned to each key item provide a continual feedback loop for quality assurance and improvement.

E.3.H. Customer Support Center

Palco's professional Customer Support team maintains a high level of performance and creates a great customer service experience through effective customer service training. We know that delivering positive experiences matter. Onboarding and training of staff follows a vetted training schedule and curriculum checklist to ensure every employee is educated on key concepts and program specifics necessary to the success of their position.

Training includes but is not limited to:

- ✔ Product and Service Knowledge
  - o Understanding the Self-Directed Person Center model
  - o Program specific information included
- ✔ Palco's tools and how they integrate
  - o Palco's Case Management Portal (CMP), Enrollment (Intake), Timesheets (Connect), CRM tool
- ✔ Communication Skills
- ✔ Soft skills
- ✔ Organization and time management

Palco has an established Customer Support Center that effectively serves the diverse population of Participants/Representatives and their Employees, in an efficient manner. See Section E.9 Customer Service for a deeper dive into our Customer Support Center and specific Arkansas metrics.

To maintain a person-centered approach, our Customer Support Center (call center) is staffed with live representatives, who have the skills needed to address concerns and provide a range of solutions or additional training. Technical assistance occurs via phone, voicemail, email, and chat features on social media channels. Palco staff has developed trusting relationships with many Participants/Representatives, their Employees, as well as other stakeholder groups, fostered over many

years of resolution, and treating callers with respect and courtesy that reflect the principles of the Department.

Providing culturally and linguistically competent customer support is an integral component of the philosophy of self-direction and the provision of self-directed services. Palco invests heavily in providing diverse populations of all ages with disabilities and chronic conditions, a variety of options when seeking information and assistance.

Our Enrollment team is comprised of program specific specialists with three (3) dedicated Arkansas-only resources. These staff spend several weeks in training to learn the Arkansas specific program policies and enrollment process. Training also includes shadowing and training to provide in-person support as they are regionally located within the state to meet the demands of stakeholders at any time. In addition to these job skill specific training exercises, they are trained on other key topics such as person-centered practices; fraud, waste, and abuse; and providing exemplary customer service. Overseen by our Enrollment Services and Training Manager, quality assurance and performance indicators are monitored during the duration of their onboarding and probationary period to ensure no requirements are missed.

E.4. Readiness, Training, and Implementation

Our training approach will continue to exceed the requirements in the Section 2.5.7 of the Scope of Work. We provide a brief introduction to our training plan on page 100, while a detailed training plan is provided as Appendix 3. Our approach to orientation and skills training is outlined on pages 101-106.

Being the incumbent, Palco brings years of experience to the table. Trained Palco staff are already operational and prepared to offer skills training in a variety of formats to benefit stakeholders. In addition, content is already drafted and ready for adoption and implementation immediately upon approval by DHS staff. We will complete a needs assessment with DHS to determine all the training requirements outlined in Section 2.5.7.D in the RFP and set a training schedule. Trainings will include enrollment documents and coverage of forms, online timesheet portal, EVV, setting up direct deposit accounts, provide background check support.

E.4.A. Palco's Detailed Training Plan

Palco continues with our flexible training approach using various methods for delivering training content of the existing and potentially new Case Management Portal (CMP) configurations, as well as EVV functionality. All training is scheduled utilizing an online registration process with links sent to the user, which helps with tracking and maintaining training attendance records. Palco maintains a variety of short training videos that are accessed on demand 24/7 for all Participant/Representatives and their Employees on the topics of Intake (enrollment), Connect (time entry), and reports like utilization and pay stubs. See **Appendix 3** for an example of a **Detailed Palco Training Plan**.

IN PERSON LEARNING

Palco's trained and already mobile and regionally based staff located strategically across the state of Arkansas are prepared to meet the one-to-one needs of Arkansas stakeholders by facilitating training in the homes of individuals. Speed, content, and delivery styles are tailored to meet the needs of each learner and ensure maximum absorption of key concepts and information.

GROUP TRAINING

At times, individuals may benefit from a group led training to promote collaborations and allow for meeting settings in the community. Palco will execute group training as applicable within the communities at locations such as the library, community centers, and senior resource locations.

WEBINARS

Palco utilized the GoTo Webinar training platform for the development and delivery of all webinar-based trainings. The platform provides Palco training department and staff with several features and benefits that enhance the training experience including customizable audience sizes, engaging polls and surveys, email integrations, reporting and analytics. Training registrations are tailored to specific topics and audiences. Additionally, the GoTo training suite includes access to a platform for the storage

of video tutorials and a learning library. Live trainings are recorded and stored for users to access later/time that is convenient to them.

VIRTUAL TUTORIALS AND LIBRARY

The Palco training library is comprised of a variety of topic focused information that is accessed on demand 24/7. Some videos are short in nature covering a very specific topic such as reading a paystub while others may be longer to cover a more extensive process such as completing and submitting an entire enrollment packet.

CMP SANDBOX TRAINING ENVIRONMENT

A live CMP Sandbox training environment, mirrors real-life test scenarios and daily workflow processes. The sandbox version of our Case Management Portal (CMP) updates with production upgrades and product releases, so that the two environments are synchronized. Palco's professional trainers conduct engaging, hands-on training using this sandbox environment to train dedicated DHS program staff supporting the Arkansas self-direction program. While leveraging expert knowledge of adult learning theory, the features of CMP are demonstrated interactively. New and existing DHS users acclimate themselves to the CMP environment without the risk of harming live production data.

E.4.B. Orientation and Skills Training

Palco values education and training in all aspects of our business both internally and externally as evidenced by our dedicated in-house training team of self-direction experts. Knowledgeable users of self-directed services are a key component to a successful program, and we know that when people are informed, they are empowered. **We provide and initial Enrollment Orientation and Skills Training sessions to Participants/Representatives** as well as refresher trainings (as needed). We also **provide trainings to Participants/Representatives and their self-directing Employees on the requirements of electronic visit verification (EVV),** the **functionality of the state's chosen EVV solution** known as AuthentiCare, **and the functionality of the Palco Connect online timesheet submission system.** We provide trainings in a variety of formats including self-paced tutorials, instructor-led group training sessions, and individualized one-on-one training sessions.

Trained Palco staff are already operational and prepared to offer skills training in a variety of formats to benefit stakeholders. In addition, content is already drafted and ready for adoption and implementation immediately upon approval by DHS staff. We will complete a needs assessment with DHS to determine all of the training requirements outlined in Section 2.5.7.D in the RFP and set a training schedule. Trainings will include enrollment documents and coverage of forms, online timesheet portal, EVV, setting up direct deposit accounts, provide background check support.

INITIAL ENROLLMENT ORIENTATION AND SKILLS TRAINING

Palco's team takes a dedicated person-centered approach to all interactions by considering the Participant's preferred location, preferred method of learning, and necessary learning supports. In

many cases, this requires an in-person, face-to-face visit to best meet their needs. The main goal of the initial enrollment orientation and skills training session is to accomplish the following tasks:

- Provide an accessible, yet comprehensive, orientation and skills training for Participants/Representatives.
- Observe the Participant's outward wellbeing in his or her natural environment.
- Assist Participants/Representatives with acquiring the knowledge necessary to ensure a thorough understanding of their role and program guidelines are provided and that program guidelines are met.
- Assure that benchmarks for health, safety, satisfaction, and utilization of services by the Participant are established.
- Guide the Participant in developing a peer support system or obtaining a Representative, when needed.
- Certify that the Participant/Representative has the skills necessary to be an effective Employer in a self-directed service deliver model and assess possible risks.
- Assess possible risks.
- Establish the frequency and level of monitoring needed to readily identify problems but encourage successful self-direction; and,
- Provide each Participant/Representative with a Program Manual that includes pertinent information for program participation, such as how to recruit, interview, hire, manage, and supervise a self-directing Employee.

Palco Counselors will use an Arkansas specific Orientation and Skills Training Guidebook as resource to guide these training session(s) to ensure consistency in the delivery of training content. A copy of the **Orientation and Skills Training Guidebook** is included as **Appendix 4**. The guidebook contains key concepts, scripts, and detailed examples to help ensure the trainee learns and retains important information. More on this can be seen in Section E.10 on Education and Outreach.

A summary of the topics includes:

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Palco provides an Employer Manual with detailed information on all the key concepts for Participants/Representatives to use as a reference. More information on this can be seen in Section E.10 on Education and Outreach.

At the end of the orientation and skills training (certification) session(s), the Palco Counselor will administer a Post Training Assessment to evaluate the Participant/Representative's understanding of the self-direction program and their role as an Employer. The Post Training Assessment is a 20 question, multiple choice quiz covering employer tasks, program rules, fraud/waste/abuse, and safety. Questions are written specifically to ensure understanding of the most critical and key tasks. A draft example of the **Post Training Assessment** can be found as **Appendix 5**. Upon completion of the Post Training Assessment, the Palco Counselor will determine if the Participant/Representative has passed with a score of 75% or higher. Questions and concepts will be re-reviewed in detail with the Participant/Representative to ensure the correct information is absorbed. The Palco Counselor will work with Participants/Representatives who score less than 75% to determine their willingness and ability to proceed. Should they wish to receive continued education and training with the Palco Counselor to retake the Post Training Assessment, the Counselor will facilitate this or work with them to identify a new individual willing to serve in role of the self-directing employer.

The administration of this Post Training Assessment not only benefits Palco and the Participant/Representative, but it also serves as a form of supporting documentation that DHS program staff can reference should individual issues arise with a Participant/Representative's ability to manage their services and Employees. Copies of every Post Training Assessment will be filed within the Participant/Representative's case file and is available on demand to external professional users like DHS program staff. The ability to recall and provide documentation certifying an individual's understanding of key concepts like program rules and preventing fraud/waste/abuse is useful information for DHS staff who administer programs and may need to produce proof that an individual understood critical concepts.

Following the orientation and skills training session(s), the Palco Counselor will assist the Participant/Representative in developing the Cash Expenditure Plan (CEP). The CEP serves as the framework for how the Participant/Representative utilize budget funds and schedule their Employees once services begin. The CEP is updated and revised with the assistance of the Palco Counselor, as needed. More information on this can be found in Section E.7 on Cash Expenditure Plans.

POST ENROLLMENT EVV AND PALCO CONNECT TRAINING

As the assigned start date is approaching, the assigned Palco Counselor will conclude the final training needs with the Participant/Representative and their enrolled Employee to ensure they are prepared for their first payroll with Palco. This supplemental training will include a refresher on the payroll schedule, refresher on the cash expenditure plan, payment process, in-depth training on using Electronic Visit Verification (EVV), and the process to review and approve time in Palco's electronic timesheet submission portal known as Palco Connect. This practice-based training, focused on the upcoming tasks related to payroll, will play an integral role in ensuring the Participant/Representative is set up for success in managing their self-directed services.

POST-ENROLLMENT FOLLOW UP

Even when services begin, the partnership the Participant/Representative has established with the Palco team does not stop there. Access to the assigned Palco Counselor is always available to the Participant/Representative in addition to the Arkansas-based Customer Support Center with friendly, well-trained, and knowledgeable staff.

Following the completion of the Participant/Representative's first payroll, Palco will complete an additional measure of quality assurance to verify that all stakeholder needs are being met. As explained in our staffing plan outlined in Section E.2.B, every Palco Counselor is a part of a regionally based team supervised by a Regional Manager who provides oversight and support for all day-to-day operations. The Palco Regional Manager assigned to the Participant/Representative will complete outreach and follow up to verify that initial enrollment and training went well. During this call, the Regional Manager will discuss the following topics to gage Participant/Representative satisfaction:

- How did the first payroll and pay period using EVV go?

- Did the Employer/Caregivers have the resources and tools they needed to be successful? Which resources were most helpful?
- Do they know where/how they can ask questions and seek support if necessary?

To conclude the call, the Palco Regional Manager will ask the Participant/Representative if they are willing to complete a satisfaction survey regarding the enrollment process and their overall experience starting self-directed services. The survey will be administered over the phone with the Palco Regional Manager dictating, via an electronic copy of the survey being emailed, or via a paper copy of the survey being mailed. A draft copy of the **Training Evaluation Survey** can be found in **Appendix 6**. The results of this survey will be compiled by Palco and provided to the DHS program staff as part of quarterly reporting.
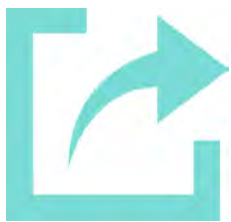
Palco will also administer an annual client satisfaction survey via an online third-party tool to ensure the respondent feels confident they remain anonymous and respond truthfully. Surveys will be sent out in January of the calendar year to collect feedback on the previous 12-month span. Data collected will be compiled in a report that is submitted to DHS program staff with reporting following the conclusion of the first quarter of the calendar year.

OUR TRAINING AND OUTREACH APPROACH

Palco continues with our flexible learning approach using various methods for delivering training content in-person throughout Arkansas' three regions or virtual training sessions. All virtual training is scheduled utilizing an online registration process with links sent to the user, which helps with tracking and maintaining training attendance records. Palco maintains a variety of short training videos that are accessible on demand 24/7 for all Employers (EORs) and Caregivers on the topics of Intake (enrollment), Connect (time entry), and reports like utilization and pay stubs. Palco's professional trainers conduct engaging, hands-on training using a sandbox environment to train dedicated Palco staff supporting the DHS program. The same training is offered to the DHS staff. While leveraging expert knowledge of adult learning theory, the features of Case Management Portal (CMP) are demonstrated interactively.

Palco provides scheduled virtual, instructor-led online training courses. Participants ask questions in real-time and be guided through live operational exercises that mirror real-life test scenarios and daily workflow processes. The sandbox version of CMP updates with production upgrades and product releases, so that the two environments are synchronized. Palco training specialists tailor training to various learning formats and audiences to ensure the best possible learning experience.

Through our decades of service to self-direction programs and populations, we have learned many lessons. Maybe the most critical lesson being that robust stakeholder communication and training is essential. During a recent implementation in another state, the Palco team provided stakeholders with over 350 opportunities to receive live instructor-led training to prepare for upcoming system changes. This large-scale initiative provided all self-direction stakeholders with multiple sessions to choose

from, to find a date/time that met their needs as well as multiple opportunities to attend repeat sessions if their learning style would benefit from it.

During this implementation, Palco leadership relied on the Plan-Do-Study-Act model to engage in continuous quality improvement throughout the extended training period. Our training team solicited feedback and used stakeholder feedback to identify areas of uncertainty and stakeholder groups that could benefit from improved clarity. Through this oversight and review, the Palco training teams identified supplemental materials to enhance knowledge retention and ensure stakeholders were adequately and properly informed. When new materials were developed, stakeholders were engaged through weekly newsletter announcements, social media, email campaigns and mailings. This multifaceted approach to communication helped reduce barriers to information access and ensure a robust training experience for all stakeholders.

E.5. Enrollment

Palco will continue to exceed the enrollment requirements in the Scope of Work of this RFP. Palco outlines our process of enrolling individuals in the self-directed program on pages 107-120, beginning with the pre-screen process. We also provide a brief description of our Arkansas-specific Employer and Employee Enrollment Packets beginning on page 120. An example of an Arkansas-specific Employer Enrollment Packet can be found in Appendix 7 and an example of an Arkansas-specific Employee Enrollment Packet can be found in Appendix 8. In addition, we offer a unique participant/employer enrollment perspective on pages 124-127.

Palco has extensive experience with a comprehensive and multidimensional approach to enrollment. Our enrollment professionals understand the State's requirement from referral and pre-screening to the requirement of the enrollment packet and all the steps in between. To illustrate the importance of this process in the life of a Participant/ Employer we have created a narrative written from their perspective, describing their engagement and experience with Palco from the point of referral to the point of an employee receiving their first paycheck. Read the Participant/Employer Narrative.

It is important to note that prior to enrollment or a referral from DHS, an individual may go through a prescreening process. This process confirms their Medicaid eligibility and whether they need help or assistance with activities of daily living.

PRESCREEN INTAKE REQUIREMENTS

Our Enrollment and Customer Support team is composed of compassionate Arkansas point of entry professionals with **seasoned assessment skills**, **adequately trained** to identify if an individual is Medicaid-eligible, **and a person-centered approach to delivering the DHS-provided prescreening tool** to determine whether an individual requires assistance with "hands-on" activities of daily living. Callers are guided through the prescreening tool to verify Medicaid eligibility and their level of assistance required to perform activities of daily living. During the pre-screen assessment, if Medicaid eligibility cannot be established, callers will be advised to contact their DHS County Office to begin the application process. See **Figure 15** for the prescreen workflow.

Figure 15: Prescreen Workflow
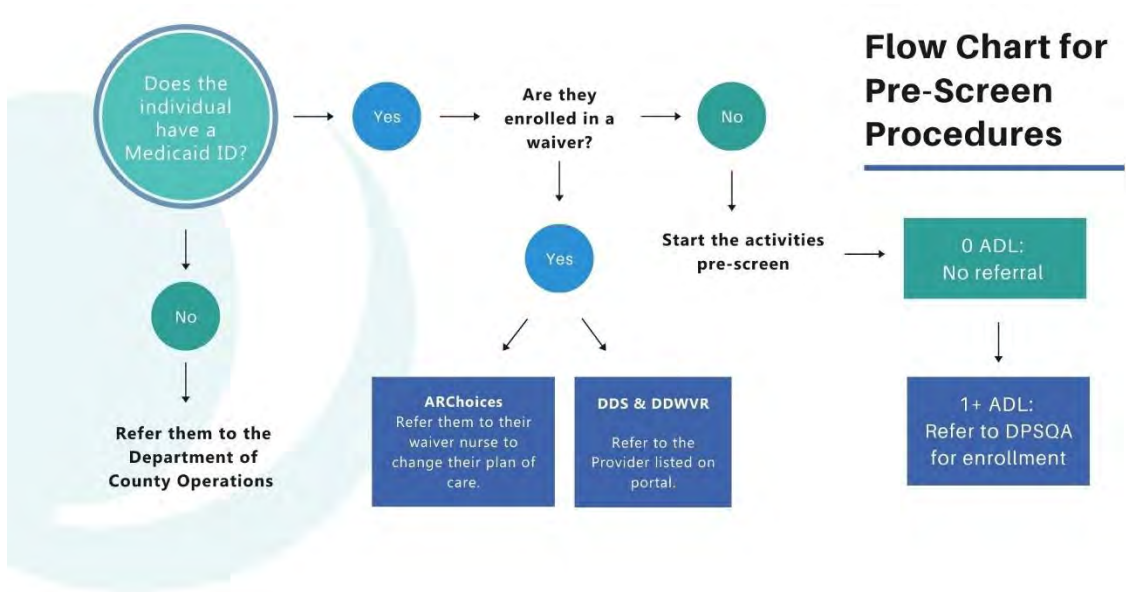
Medicaid participants have freedom of choice when selecting service delivery models. If the Participant chooses the self-direction service delivery model and contacts Palco to enroll, Palco will pre-screen these participants for potential enrollment into the self-direction program.

Participants who intend to enroll will call Palco's toll-free customer support number. If the individual calls after hours or during high call volumes, they will be prompted to leave a voicemail. Customer Support staff will return their call within one (1) business day.

VERIFYING MEDICAID ELIGIBILITY

The Medicaid eligibility of all individuals seeking enrollment must be validated through the patient eligibility and benefits inquiry section of the Arkansas Medicaid Web portal. At least one of the following sets of information is required to search for an individual's Medicaid eligibility:

- Medicaid ID and date of birth
- Medicaid ID, first name and last name
- First name, last name, and date of birth

ACTIVITIES QUESTIONNAIRE

The prescreen Activities Questionnaire is designed to determine whether someone is likely to be found eligible for long-term services and support, home- and community-based waiver services, or state plan personal care services.

The Palco Customer Support staff informs the caller that to help the individual enroll, they need to respond to a series of questions about level of assistance they need to perform activities of daily living.

Our staff make sure to notate any comments made by the caller that could be important to DHS regarding the referral (or to the Palco Counseling staff if the individual eventually enrolls). The Customer Support staff inform the individual that their answers should be based on their current state, which is indicative of their overall general state (i.e., the purpose is not to screen individuals for their needs currently if they have just been released from surgery, nor is the purpose to screen an individual during their unusually good periods. Instead, the purpose is to screen someone based on their general needs).

Once completed, the Palco Customer Support staff submit the prescreen module in our Case Management Portal (CMP) which scores the activities. For anyone meeting any of the criteria, as determined by the eligibility algorithm, CMP assigns a "referred to DHS" status.

This individual will be referred to DHS program staff for enrollment in personal care. The Customer Support staff will inform them that they must be present at the time of the DHS nurse's visit. The individual will be advised that this service will require physician's approval and that if they have not seen their doctor within the last sixty (60) days, they should schedule an appointment.

If the criteria are not met, the Case Management Portal (CMP) will assign an "Inactive/No Referral" status. The individual is referred to the waiver nurse in their county for a full evaluation.

PRE-SCREEN FOLLOW-UP

The outcomes of the pre-screen are as follows:

- Referred to DCO
- Referred to Waiver Nurse
- Inactive/No Referral
- Referred to DHS

For the first three statuses above, CMP generates a report that Palco staff run biweekly. We use this information to conduct a follow-up to ask how their enrollment is coming along. If they need additional help or more information, Palco staff will either send the individual additional materials about the program or help the individual obtain access through the proper DHS channels. See **Figure 16**.

Figure 16: Referral Flow Chart

For the status of "Referred to DHS," DHS program staff are informed daily via the Referral Report. The report contains demographic information and the outcome of the pre-screen call. The Referral Report is uploaded to a DHS 'secure MoveIT DMZ site.

Palco staff run reports for individuals who are pending enrollment. Completed enrollments should occur withing sixty (60) days of receipt of referral.

E.5.A. Enrolling Individuals in the Self-Directed Program

Enrollment starts with a referral from DHS and includes outreach and support by the Palco Customer Support, Enrollment and Counseling teams throughout the enrollment process. In this section, we will walk you through the Prescreen, Referral, and Enrollment process from start to finish. We also provide sample Employer and Employee enrollment packets containing all the necessary and required forms.

DHS REFERRALS FOR PROGRAM ENROLLMENT

Program enrollment begins with receiving a referral from DPSQA. A referral is simply a notification of an individual who is seeking program enrollment and a request for further action by Palco.

Medicaid requires that Palco complete an enrollment within 60 days. Thus, within 60 days after Palco receives a referral, the Palco team will complete the following tasks:

- **Endorse the participant's ability to self-direct** by ensuring that the participant or her representative has the skills, knowledge, and abilities to direct their care and are ready to do so, as evidenced through documented orientation sessions and endorsement by a Palco Counselor; or assess that the individual is unable to self-direct or does not have an individual who may serve as a representative to assume the duties of the employer role.
- **Administer and assist with the completion of enrollment documents for the Participant or their Representative** to fulfil the role as the legal Employer of Record.
- **Administer and assist with the completion of enrollment documents for each caregiver** seeking to provide paid direct support services to the Participant.
- **Assist with the development of the participant's Cash Expenditure Plan**.

✔ **Review and establish a reliable emergency backup plan** that meets the needs of the Participant.

Referral spreadsheets sent by DPSQA will be stored electronically in their original format. Referrals are physically inspected before the data is uploaded to our Case Management Portal (CMP. Any individual forms sent by DPSQA with the referral spreadsheet are stored in the individual's case file. When Referral data are uploaded to the Palco system, an error log is generated, displaying individuals who were not uploaded to CMP and the reason for the error. Common errors will include the following:

✔ Medicaid ID number is not enough digits.
✔ The individual is already in our system; or
✔ Formatting issues with the Referral information.

When Referral information contains errors and fails to upload to our CMP, Palco staff take the necessary steps to obtain the correct Medicaid ID number which may include performing a search in MMIS or contacting DPSQA. This extra validation ensures quality in the data across the various systems needed to synchronize.

The Palco system automatically assigns all new referrals an "Uncertified" status for tracking and follow up purposes. This status alerts users that the individual is not actively enrolled in the self-direction program, but that they are in the process of receiving training to become enrolled.[6] In addition, CMP assigns the individual a Palco ID number and a region.

To complete a referral, home visits are scheduled. However, before home visits are completed, Palco must first conduct some administrative tasks to lay the foundation for the home visit.

PALCO IDENTIFICATION NUMBER

Each participant, representative, and employee that initiates enrollment is assigned a Palco ID number. Palco ID numbers are used to refer to an individual's case file and the related information pertaining to that account. Palco identifies individuals with their Palco ID numbers instead of their Medicaid ID numbers to protect the individual's private health information and to add an extra layer of security when communicating with individuals through our Customer Support Center.

The Palco Case Management Portal (CMP) automatically assigns a Palco ID number to each new referral uploaded into the database. This number is a unique identifier assigned to each case and is populated on certain forms for easy search in CMP.

Self-directing Employees are also given unique identifiers, but their identification numbers are nine (9) digits composed of the five-digit Palco ID number associated with their participant and the last four (4) digits of the Employee's Social Security Number.

TEAM ASSIGNMENT

When a referral is uploaded to the Palco Case Management Portal (CMP), the Participant is automatically assigned to a team that will work in tandem to get them trained, certified, and enrolled in an efficient manner. Palco Enrollment Specialists and Counselors work together with a clear division of duties to get the Participant/Representative trained, certified, and enrolled.

Regional Managers assign Palco Counselors to a particular caseload based on geographic proximity to the participant. Individuals who are newly assigned to a Palco Counselor are given an "Uncertified" case file status. This denotes that they have not received all the proper orientation and skills training to begin participating in the self-directed program model. Regional Managers must assign a Palco Counselor within one (1) day of the referral date listed on the Pending Enrollment Report. Once a Counselor is assigned, the Regional Manager logs this information in the database so that in-house staff can view the assigned Counselor in our Case Management Portal (CMP).

Typically, the Regional Manager will assign a Counselor based on the zip code of both the Counselor and the participant. This local support allows for a person-centered approach and ability to meet with the Participant in their home/community, at a location of their choosing. It is by choice that Palco remains in our home state. **Figure 17** illustrates how our teams are divided through the state.

Figure 17: Arkansas Regional Support
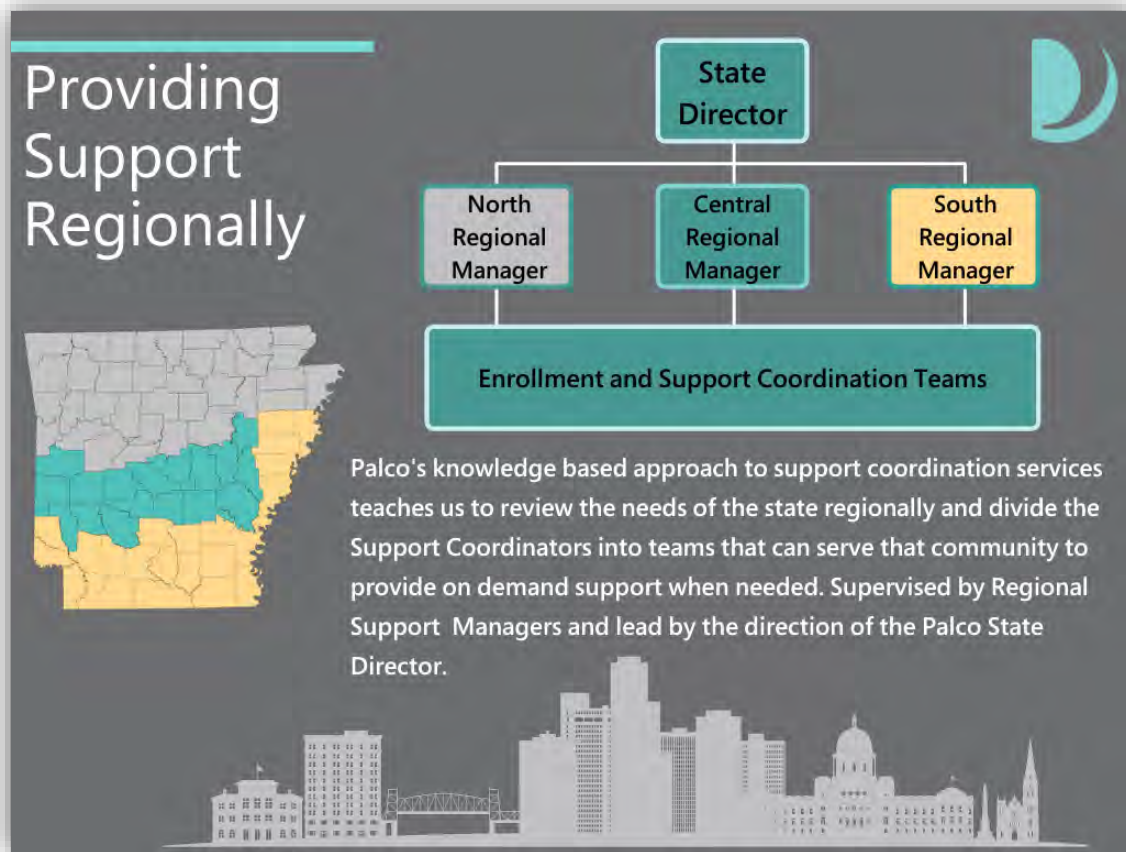
INITIAL CONTACT

Palco Counselors are notified via email that they have a new Participant assigned to their caseload which prompts the outreach to begin the training and enrollment process. Within three (3) business days of this notification, the Counselor will reach out to the individual to introduce themselves and make initial contact. During this outreach they will:

- Schedule an initial orientation and skills training appointment to begin the training and onboarding; and
- Discuss and obtain information about the natural supports available to the Participant. This conversation allows prospective participants to begin thinking about individuals who may serve as a Representative (Employer) or those that are available to perform caregiving duties (Employee).

The Counselors follow a basic script, which welcomes individuals to the program, provides a brief overview of the coming events, and answers any questions on the forthcoming process. The Palco Counselor is knowledgeable and prepared to discuss and explain complex situations regarding having a legally appointed guardian or situations where the individual cannot make decisions on their own. They provide information on what it means to designate a Representative to serve on the Participant's behalf and who they may want to have available during the orientation and skills training session(s). Palco staff are careful to explain that **enrollment will only occur after the participant, or the representative has successfully completed the orientation and skills training curriculum and deemed "certified" by a Palco Counselor.**

Palco Regional Managers monitor all open tasks related to Counselors to ensure timely communication, outreach, and scheduling of orientation and skills training sessions with prospective participants.

See Section E.4.B. for more information on the initial orientation and skills training session(s). Upon completion of the orientation and skills training session(s), the Participant/Representative will have a dedicated support resource at Palco that they feel confident will assist them through the process. The Palco Counselor sends a notification to the Enrollment team to generate the packets and begin the forms portion of enrolling in self-direction.

COMPLETING ENROLLMENT

As previously mentioned, the Palco Enrollment Specialist will work in tandem with the Palco Counselor to get the required and necessary documents completed. **Palco's proprietary online enrollment system known as Intake is the preferred and most efficient way to enroll**. When possible, based on the individual's access to technology, the Enrollment Specialist will schedule an enrollment appointment with the Participant/Representative and their Employee(s) to assist with the completion and submission of all enrollment forms. During this appointment, the trained Enrollment Specialist will explain the purpose and steps for completing every form within the packet.

INTAKE

Intake is the Palco enrollment application and contains both internal and external capabilities. It provides an online enrollment platform for electronically signing/submitting forms and a platform for document processing and enrollment setup.

Over the past 20 years, we have streamlined the enrollment process by simplifying our documents as much as possible, requiring only the necessary information to appropriately render VF/EA services, and remain compliant, and in good standing with every program and their specified requirements. **Palco's online cloud-based enrollment system is the most user-friendly in the market and allows Participants/Representatives and their Employees the opportunity to sign all required forms online and enroll via a completely paperless process.**

Palco's Intake system is the enrollment platform used to generate packets, track enrollments, and allows external enrollees to digitally complete their paperwork and packets online. See **Figure 18.**

Figure 18: Palco Intake Advantages

Three CMP Intake Advantages

Secure

Secure customized links with prefill electronic packet sent to enrollees for fast electronic enrollment.

Fast

Fast completion intake module with step-by-step instructions for every form which means there are no missing forms and fewer corrections.

No Delays

Electronic submission preventing lost paperwork, distorted forms, and delayed enrollment due to slow mail delivery.

We offer three methods of packet distribution for Employer and Employee enrollment packets.

1. **Online enrollment.** Enrolling online through the portal is the fastest way to sign up for the program. Users sign and submit all forms online and are notified of submission errors in real-time, allowing them to correct issues before finalizing and submitting documents.
2. **Mailed packets.** Individuals request that a packet be mailed to the home by calling Palco. The customer support agent logs the request in the web portal. Via workflow, the packet is prepopulated and sent to a queue for printing and mailing.
3. **Emailed enrollment.** Emailed requests for enrollment are logged into the web portal. An enrollment specialist generates a prepopulated packet with the click of a button, and the packet is sent to the individual via secure, encrypted email.

Palco's unique position as the incumbent allows us to come prepared with an already approved and operational employer enrollment packet. Through this procurement and continued partnership, Palco welcomes any feedback or requests for changes to the existing packets by DHS program staff. Palco will work to ensure the forms and packets contain all of the preferred and requested information and will solicit final approval of the enrollment packets upon execution of a new contract.

PALCO'S INTAKE, ONLINE ENROLLMENT, SYSTEM

Participants/Representatives and their Employees who choose to enroll online receive an automated email notifying them that their packet is ready for completion. Each welcome email contains an encrypted token that allows the user to access their personal enrollment. Access is granted once security is verified. The online enrollment system owned and operated by Palco is unrivaled by our competitors and cannot be matched. Built with self-direction and accessibility in mind, it makes the enrollment process fast and easy, one of the processes we know serves as a barrier to accessing services. See **Figure 19** below for an enrollment workflow summary.

Figure 19: Intake Process Flow
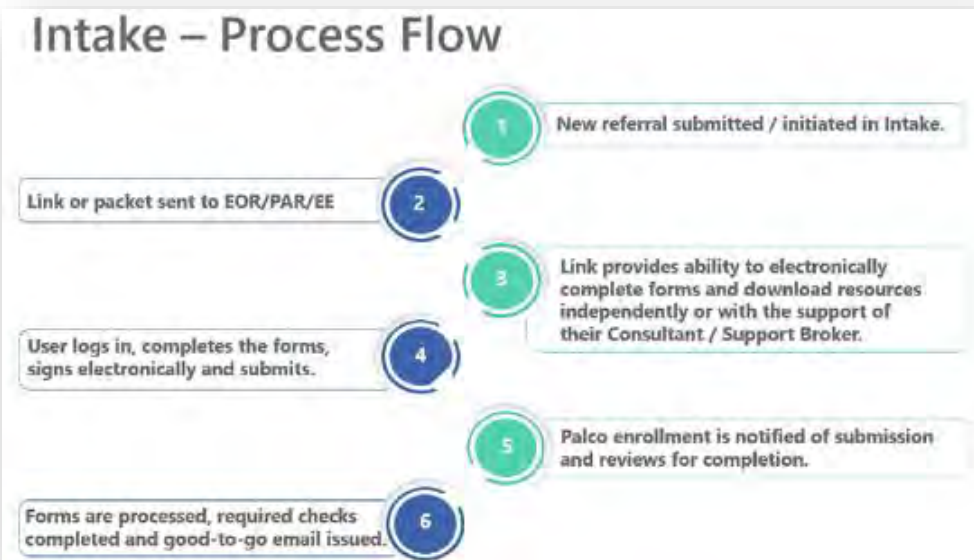
Palco has completed the Intake system customization process with DPSQA, and the required Arkansas and Federal enrollment forms are in place. Value-added configurations include prefilling FMS and tax information as necessary and a designated signature wizard that identifies exactly where data and signatures from the enrollee are needed. The total estimated enrollment time when using the Intake application to complete the necessary forms averages less than 5 minutes (estimate not including criminal background check processing time).

Once the enrollee is logged into the Palco Intake system, the home screen prompts the enrollee step-by-step with a visual workflow that guides the user through each enrollment module. Palco's Intake platform makes program enrollment and transition extremely easy. Users enter their data online, and this platform pre-populates forms that are signed digitally. Every tab and widget are custom coded to Arkansas program specifics and designed to gather all pertinent information to populate state and federal tax and labor forms. **Self-directing employees upload pictures of the supporting documentation needed to submit the** *USCIS I-9 form*, like their driver's license, birth certificate, passport, etc. As the forms are completed, the home screen reflects their percentage completion in real-time.

Palco's Intake application has built-in controls to prevent form submission until all required fields are completed accurately. Each form has a required set of data points. Users are not allowed to continue or submit their enrollment to Palco until all data points are complete. In real-time, the system notifies users of errors and missing data fields so that they correct them instantly. **Figure 20** below provides a visual of the enrollment summary tab alerting the user to missing information, as denoted by a red asterisk.

Figure 20: Online Enrollment Summary Screen
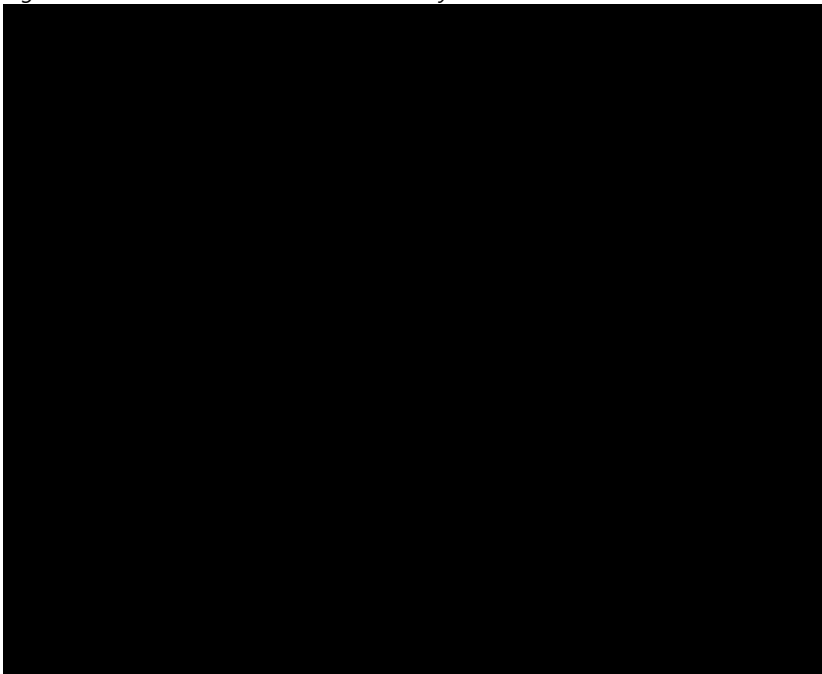
With the completion of each step in the workflow, the tabs on the left-hand navigation panel display the percentage of forms that have been completed until the user has completed all paperwork (as evidenced by a 100% completion rating).

Submission of a completed enrollment is instant, getting the forms directly into the hands of a Palco Enrollment Specialist (rather than waiting on the delays of the USPS, a scanner, or email box). Once the enrollment paperwork is complete, the Enrollment Specialist follows up within three (3) business days to process the forms and complete the final enrollment steps.

Once an enrollment is completed, the user submits it to Palco with the click of a button. The screen shot in **Figure 21** will display the submitted documents, allowing the user to download the completed and signed forms they signed for future reference.

Figure 21: Online Enrollment Submission Notification Screen
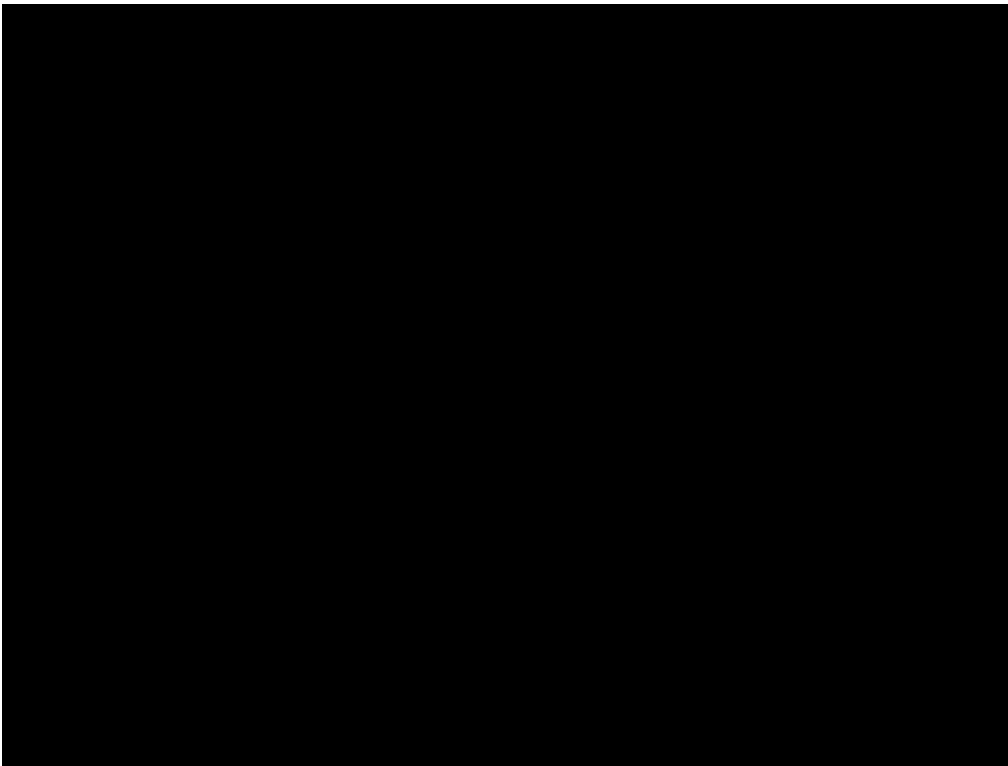
After submission, three important steps occur:

- ✔ Data is inserted directly into our database.
- ✔ The documents are saved in our document management system in the enrollee's case file with appropriate metadata tags for easy retrieval. This eliminates the need for scanning, which sometimes result in hard-to-read forms, which delay enrollment.
- ✔ An immediate, real-time notification is auto generated and sent to the Palco enrollment staff assigned to the Arkansas enrollment work queue.

Enrollment staff then quality check and review the forms. Mistakes are rarely made with online enrollment packets because of the system's real time integrity checks and workflows. However, should there be errors, they are logged into the system. Automatic emails notify the enrollee of the error in clear and specific language, directing them to the issue(s). Reminder emails are sent at various time intervals after the initial submission.

PAPER-BASED ENROLLMENT

As mentioned, **Palco has strived to improve the Arkansas program and overall efficiency during the last few years by decreasing the volume of paper enrollments and offering a technology solution that benefits all stakeholders**. While it is highly encouraged, Palco understands the needs of the self-directing population with limited access to technology; therefore, **we also maintain a paper-based enrollment option to ensure all individuals have access to services**. In the event a paper enrollment packet is received, Palco staff immediately scan and route the enrollment documents through our document management system, where they are time-stamped with the date of receipt. All forms are pre-coded with appropriate information prior to us making them available. These codes allow our system to automatically route documents and forms to the appropriate program enrollment processing queue. This queue is staffed with Palco Enrollment Specialists dedicated to this project, who understand the unique requirements of the Arkansas self-direction program.

Packets are reviewed against a standard checklist to ensure accuracy and completeness. Should a paper packet contain forms with incorrect or missing information, the information is logged in our system and automatic emails are sent to individuals who provided an email address.

Only the forms with errors are returned with an explanation of how to remedy the errors. Follow-up activities are noted in our system through a workflow tracking process. This monitors the time taken for enrollment, how long errors have been outstanding, and allows our Customer Support, Enrollment, and Counseling teams to see all pertinent information in real-time should an individual call with additional questions or needing assistance on the process. Notifications are done via mail, email, or phone, when applicable. Enrollment assistance will also be provided in person by our in-house Counseling staff, as requested.

All packets, regardless of the source, are stored electronically in our document management system which is tied via direct Application Programming Interface integration to our Case Management Portal (CMP). Therefore, anyone with access to our CMP can view the approved and rejected documents sent to Palco.

Documents received by online enrollment, email, or fax are automatically uploaded to our document management system, without any required user action.

Mailed documents are scanned and inserted into our document management system, where optimal character recognition and metadata tags are assigned. Barcoding allows them to enter the appropriate work queue.

Once in the system, a workflow is initiated, and our Enrollment staff are alerted via email and job queuing to process the documents. To ensure a smooth and transparent enrollment process, we monitor all enrollment-related activities, including paperwork completion and worker clearances, through the following:

- An electronic checklist, which captures key dates and events, such as mail date, follow-up activities, background and credential checks, and receipt of forms, is utilized so that all staff know where the individual is in the enrollment process, should they call for assistance.
- Application of benchmarking standards, such as the time it takes to enroll and credential providers.
- Reports for cases with a pending enrollment status, expired licenses, or credentials, and taking follow-up action to complete enrollment and renew the provider's information.
- Management review.

Further, Palco will operate in compliance with the standards outlined in this RFP and maintain documentation to support its compliance with the standards described in this RFP. We will operate in accordance with §3504 of the Internal Revenue Code 70-6, 1970-1 C.B. 420, as modified by IRS REG-137036-08-1 and Rev. Proc. 2013-39 and any other revenue procedures, notices or publication promulgated by the IRS in the future.

BACKGROUND CHECKS FOR WORKERS

Palco assists with the facilitation and administration of the criminal background checks in accordance with the program rules and statue during the enrollment process. Currently, Palco ensures that the following employment clearance registry checks and criminal background checks pursuant to ACA 20-77-128 are completed:

- Arkansas Adult Maltreatment Registry Check.
- Arkansas Child Maltreatment Registry Check.
- DHS and OIG Excluded Provider Checks.
- State Criminal Background Check (CBC); and
- Federal Criminal Background Check (if appropriate).

We ensure these required checks are completed before issuing a "Good to Go" notification to the self-directing Employee which is their confirmation that they can proceed with providing services to the Participant and receive payment. Beginning June 1, 2022, we will ensure employment enrollment activities conform to the requirements set forth in Act 717, including the Employee drug screen requirement.

This is accomplished by providing self-directing Employees the necessary forms to complete the required registry and background checks, developing resources that guide them through the process, and collecting and processing particular forms. Palco understands the DHS' commitment and goals to move towards more electronic processing for background checks and is committed to assisting in that

process. Palco is also willing to work with DHS program staff to improve the overall background check process by creating strategic pathways to make it more accessible to caregivers.

We are passionate about building the direct support workforce and ensuring it is seen as a thriving career, not just a temporary job. Barriers to employment within self-direction in Arkansas such as limited access to notaries, fees associated with checks, and access to fingerprint locations will be mitigated with the in-state presence and geographically located support of the Palco team. Palco looks forward to brainstorming the following ideas, and more, in conjunction with the DHS team during our next contract term:

- Establishing regionally based notaries for caregivers to access at no cost.
- Facilitate the process of Palco collecting and processing the State of Arkansas criminal background checks through the State website.
- Establish a process for the collection and remittance of payment for background checks such as the collection from Participant budgets or processing payments provided by the caregivers.

Palco feels confident that these enhancements in conjunction with our over 20+ years of experience breathes new life into the caregiver workforce in Arkansas providing a new pool of eligible and eager caregivers to meet the needs of self-direction participants and stakeholders.

START DATES

As the Participant/Representative (Employer) certification is complete and all enrollment documents have been received and processed, the Palco Enrollment team will communicate with DHS program staff of the Participant/Representative's readiness and officially request a start date from DHS. Currently done via reporting and uploads, Palco will continue this process and offer enhancements to provide automated notifications and a streamlined technology solution for communicating with DHS program staff.

Every record within the Palco system contains a case status that is used to determine what dates of service are payable vs not. Case statues contain an effective date that is integrated with payroll validations and service eligibility. The status options currently include active, terminated, ineligible, uncertified (as mentioned previously), and deceased. Access to modify and enter new case statuses will be given to DHS program staff to allow them to quickly enter start dates for new incoming Participants in the Palco Case Management Portal (CMP), effectively eliminating the need for daily reports and uploads to the DHS MoveIT DMZ site.

ENROLLMENT PACKETS

Our Enrollment team is composed of compassionate point of entry professionals with seasoned assessment skills, a thorough understanding of the DPSQA referral process, and in-depth knowledge of the Palco Intake and Case Management Portal (CMP). As your incumbent, our *Employer Enrollment Packet* and *Employee Enrollment Packet* are already tailored to the Arkansas program needs and will

be reviewed with DHS program staff during the new contract term to determine whether any changes need to be made.

Our goal is to reduce enrollment wait times and make the transition to self-direction as smooth as possible. We prepopulate all packets to the extent possible to reduce the fields that individuals must complete, and we offer a variety of solutions for completing packets. New packets and incoming Participants/Employers will be provided pre-populated enrollment packets within three (3) business days of the referral to the DPSQA programs. Specific enrollment forms are also available on the program page at www.PalcoFirst.com.

For paper-based enrollments, prior to mailing enrollment packets, we pre-populate data fields with known information—this includes Palco's information (e.g., contact information, FEIN, our agents and their Centralized Authorization File [CAF] numbers), participant and/or Employer information (e.g., name, address, date of birth, phone number, and other identifiers), and general information (e.g., "HCSR for "Home Care Service Recipient," as required, in member title fields). This mitigates potential errors, speeds up enrollment times, and reduces the burden on Participants/Representatives.

Employees also have pre-hire packets that include registry check and criminal background check consent forms, instructions for fingerprinting, EVV registration requirements, instructions for obtaining an NPI from the Arkansas Medicaid program, and other important items. Employee pre-hire packets are prepopulated with their information and can be completed via the Palco Intake system, downloaded online, or mailed.

All packets contain the following information:

- Introductory information that explains the packet and provides Palco contact information (hours of availability, address, and phone number), policies on pay including overtime and budget, roles, and responsibilities of Palco, DPSQA, and the Employer. Also included is information about the availability of materials in alternate formats (e.g., large print, Braille, Spanish).
- Information about the enrollment process includes details on background checks and employment eligibility requirements.
- A checklist of all forms and requirements to assist in completion.
- Clear instructions describing the form's purpose and completion requirements and providing examples of properly completed forms.
- Payment schedule that shows timesheet pay cycles, due dates, and paydays.
- Portal tutorials that guide individuals on accessing and using our system and how to obtain technical assistance and support.

E.5.B. Sample Employer Enrollment Packet

The *Employer Enrollment Packet* contains at a minimum:

- ✔ Cover letter or Palco brochure with pertinent Palco information as described above.
- ✔ Employer agreement form and instructions.
- ✔ Employee qualification form and instructions.
- ✔ IRS Form SS-4, *Application for Employer Identification Number.*
- ✔ IRS Form 2678, *Employer/Payer Appointment of Agent* (semi completed).
- ✔ IRS Form 8821, *Tax Information Authorization* (semi-completed).
- ✔ Designation of Surrogate Employer form, if applicable
- ✔ Intake form to verify basic demographic information and obtain emergency contact information.
- ✔ Authorization and Consent Form that allows us to act as agent prior to receiving IRS or state approval.
- ✔ Employer Agreement Form that lists the rights, roles, and responsibilities of the Employer, Caregiver, Palco, and DPSQA; and

To further aid in the education of workplace safety Palco includes a variety of supplemental information including home safety checklists, how to identify and report injuries, what to do in an emergency, a helpful contact list, and universal precautions to avoid injuries. Copies of employer enrollment forms are maintained in the Employer's file for up to six (6) years.

Palco's online enrollment platform makes enrollment a low to no-hassle experience, with most enrollments being completed within two (2) days. In the event of an error in enrollment our dedicated Enrollment Specialists will follow up to correct the error within two (2) business days.

As discussed earlier, Palco's Intake application is the enrollment platform used to generate packets, track enrollments, and allows external enrollees to digitally complete their paperwork and packets online. Employers and their self-directing Employees will be provided access and the ability to enroll online.

Please see **Appendix 7** for an example of **Palco's Employer Enrollment Packet**.

E.5.C. Sample Employee Employment Packet

The *Employee Employment Packet* contains at a minimum:

- ✔ Introduction letter.
- ✔ Employee application and instructions including information on the relationship between the employer and the qualified caregiver.
- ✔ Employee Agreement.

- Notice form for pre-employment criminal background check and state criminal background check (Form SP-164), Federal Bureau of Investigation ("FBI") Criminal History Check, and DHS Child Abuse History Check (Form CY-113) forms and instructions.
- IRS Form W-4, *Employee Withholding Allowance Certificate* with instructions.
- US CIS Form I-9, *Employment Eligibility Verification* with instructions.
- Worker Rate Sheet.
- Timesheet due dates/Payday Schedules.
- Direct Deposit Information and Signature Form; and
- Employment Enrollment Checklist.

As part of the Employee enrollment process, Palco will assist caregivers in obtaining a National Provider Indicator (NPI) using taxonomy code "*Attendant Care Provider*". We will assist with all form completion and enroll caregivers within five (5) business days unless an exception is requested and granted by DPSQA.

As part of the Employee intake process, we gather information such as relationship to the participant/employer to ensure the following individuals cannot enroll and be paid with Medicaid funds and program rules:

- Spouse
- Legal guardian of the Beneficiary
- Attorney-in-fact granted to direct the Beneficiary's care
- Individual who completed prescreen on behalf of the Beneficiary
- Individual listed as point of contact on the 9503-Plan of Care completed by a DHS RN during the assessment
- Individual who signs the assessment on behalf of the Beneficiary
- Payee on behalf of Beneficiary for social security benefits
- Any individual on the Beneficiary's bank account
- An individual who owns the home the Beneficiary resides in and is not related by blood, marriage, or adoption
- Any individual prohibited by federal and state laws and regulations

Please see **Appendix 8** for an example of **Palco's Employee Employment Packet**.

Participant/Employer Experience

Palco has found that in the technical writing of RFP's the voice of the Participant is lost. **To help illustrate the Palco process we have created a narrative written from the perspective of a Participant/Representative, describing their engagement and experience with Palco from the point of referral to the point of an employee receiving their first paycheck.** Please assume that the employee had errors on their initial timesheet/EVV submission which required resolution.

I have a new FMS named Palco. It's not my first rodeo with an FMS provider but it has been the most streamlined enrollment process and I am grateful. I made the choice to enroll using their online system called "Intake". An Enrollment Specialist assigned to my case reached out to me the same day my Support Coordinator sent the referral and got me all set up. The Enrollment Specialist even stayed on the phone to make sure I could log in since I was nervous about my computer skills.

Once I was in the system, the home screen prompted me step-by-step through each enrollment module. On the left side of the screen there was a navigation display that showed me how far I was in the process and what was left to complete. It also prevented me from accidentally submitting before I completed the forms. Then, I could digitally sign each form and see that I was 100% complete!

My caregiver was also able to log in and download pre-hire packets that included background check consent forms, instructions for fingerprinting, and other important items. The pre-hire packets were prepopulated with their information and were printed off so we could complete them and mail them off. Caregivers can also use the online enrollment system, known as Intake, to fill out the forms electronically.

The employer packet contained all the forms and required information for my program. So much of the information was prepopulated that I enrolled by signing my forms in under five minutes. I breezed through the enrollment because a lot of the required fields were prefilled with Palco's contact information, FEIN, Palco's agents, and their Centralized Authorization File [CAF] numbers. My Employer and Caregiver information were filled in, like my name, address, date of birth, phone number, and other identifiers. Plus, there was general information like "HCSR" for "Home Care Service Recipient," as required, in Participant title fields. It made it easier for me, improved the time I had to wait to enroll, and I felt as if I had fewer errors.

Because it was so easy, I was not surprised to learn that Palco is one of the only FMS partners with a fully online enrollment system that allows employer's and their caregivers the opportunity to sign all required forms online and enroll via a completely paperless process. It was clear that Palco's goal is to reduce enrollment wait times and make the transition to self-direction as smooth and easy as possible.

I understand, from peers enrolled in my program, that we all received either a mailed packet, or in my case an email with a digital link, within three (3) days of our referral and that there are three ways to receive employer and caregiver packets:

✔ **Online enrollment.** From Palco's instructions I understood that enrolling online through the portal is the fastest way to sign up for the program. I signed and submitted all forms online and was notified of submission errors in real-time, allowing me to correct issues before finalizing and submitting documents.

✔ **Mailed packets.** Some people requested that a packet be mailed to their home by calling Palco. The customer support agent logged the request in the web portal. Then through their workflow process, the packet is prepopulated and sent to a queue for printing and mailing.

✔ **Emailed enrollment.** The people who emailed requests for enrollment were logged into the web portal. An enrollment specialist generated a prepopulated packet with the click of a button, and the packet was sent to the individual via secure, encrypted email.

I was curious what happened to the documents once they were received by Palco. I learned from my Enrollment Specialist that **documents received by online enrollment, email, or fax are automatically uploaded to their document management system, without any required user action.**

I was thrilled to learn that Palco has an entire enrollment and training team. Cody Waits, the Enrollment Services and Training Manager as well as my dedicated Enrollment Specialist provided training on the VF/EA enrollment and payroll processing procedures to me and my employees, and I understand he even trains state personnel on Palco's Case Management Portal. I was provided training on the self-direction service program model and requirements; rights, risks, and responsibilities; and, how to engage in both budget and employer authority.

Once in the system, a workflow is initiated, and the Palco enrollment team is alerted via email. To ensure a smooth and transparent enrollment process, they monitor all enrollment-related activities, including paperwork completion and employee clearances, through the following:

✔ **An electronic checklist**, which captures key dates and events, such as mail date, follow-up activities, background and credential checks, and receipt of forms, is utilized so that all staff know where the individual is in the enrollment process, should they call for assistance.

✔ **Application of benchmarking standards**, such as the time it takes to enroll and credential providers.

✔ **Reports for cases** with a pending enrollment status, expired licenses, or credentials, and taking follow-up action to complete enrollment and renew the provider's information.

✔ **Management review.**

Palco explained what their role is as the Fiscal Intermediary acting as the agent between me and my program Department. I was particularly interested in their management of payroll. Here is the list they sent me.

MANAGEMENT OF EMPLOYEE PAYROLL

- ❯ Establish the Employer of Record (EOR) (either the Participant or their Authorized Representative, as appropriate) in accordance with §3504 of the IRS code and Revenue Procedure 70-6, as modified by REG 137036-08 and Revenue Procedure 2013-39.

- ❯ Palco will register with state and federal tax agencies, including obtaining a federal employer identification number (FEIN) and registering the employer with the appropriate state tax and labor agencies.

- ❯ Verify prospective caregiver's citizenship and alien status and determine that caregivers and vendors meet the qualifications for the services they are providing per state requirements.

- ❯ Process caregiver timesheets in accordance with the participant's self-directed services budget/individual spending plan.

- ❯ Comply with federal and State Department of Labor (DOL) wage and hour and unemployment insurance tax rules and the State's minimum wage rules pertaining to domestic workers.

- ❯ Comply with IRS regulations pertaining to domestic employers.

- ❯ Prepare and distribute qualified employee payroll, including managing federal and state income tax withholding and employment taxes, in compliance with the participant's self-directed services budget/individual spending plan.

At the end of my enrollment process, I was sent a "good-to-go" email that provided me with my active date and a custom link for enrolling in the online timesheet system (Connect) including directions for Electronic Visit Verification (EVV). The email contained valuable links to training videos and user guides to help me understand EVV and the online timesheet website. I was incredibly happy to learn that I can view, and print pay stubs on demand via Connect. The process to register in Connect was very fast. I just provided some data and set my password. I was also able to assist my caregivers with setting up the EVV application on their phones by following the directions in the user guide. Each of my caregivers also received their own custom good-to-go email with instructions and training resources. I was appreciative to be copied on that email to the caregiver, so I am fully informed and able to direct them appropriately.

On the first day of my service active date, I scheduled my caregiver for the morning shift, and she arrived promptly. At the start of the shift, she clocked in using EVV and began her work. The clock in process with the EVV application took about 30 seconds and was noninvasive to my personal privacy. My caregiver completed her shift and at the end was able to clock out, quickly recording her shift activities. I learned in the online timesheet training that EVV shifts are visible in Connect the next day, so we logged in together that next morning to make sure this was working. The shift from the previous day was visible in Connect and my caregiver had many options if she needed them such as editing the shift, deleting the shift, or submitting the shift. We let all shifts build up for the pay period and set a reminder to submit them all at the end of the pay period.

After the pay period ended, my caregiver was able to log in to Connect and review all the shifts from the last couple of weeks. She had one instance where she arrived, and I was in desperate need of an immediate transfer, so she clocked in a little late. During the review in Connect, she was able to correct

this shift by changing the clock-in time from 8:07 to 8:00 when the shift had begun. When done, it was submitted by the caregiver to me, and I received an email notification letting me know the timesheet was waiting for me. I logged in to my account and saw the timesheet pending my (the Employer) review. I clicked on it, reviewed the shifts, and hit Approve to send it over to Palco. I did have an option to reject it, send it back to my caregiver, if she needed to fix something, but luckily it was already addressed.

Once submitted to Palco, I was able to monitor the timesheet processing via the status changes. The system reminds me of the Domino's Pizza Tracker where I can track progress in real time. I also like to stay up late and was glad I could view details 24/7 whenever it was convenient for me. Once the timesheet was reviewed by Palco it changed from "Pending Palco Review" to "Approved for Payment." It gave me peace of mind to know, even before the pay date, that my caregiver would be paid on time.

On pay day my caregiver informed me that her deposit arrived in the bank account they designated during enrollment without issue. I was glad they offered a direct deposit option that is immediate, and my caregiver had no delays in accessing her funds on payday. My caregiver and I were both able to view her paystub in Connect. I was also able to check my spending to ensure I was in line with the plan of care my Support Coordinator developed and verified I was not overscheduling my caregiver using the spending summary dashboard available in Connect.

Because my caregiver had questions about something I could not answer, she called Palco's Customer Support Center. She told me that she had less than a 30 second wait time, and the person on the phone was kind, helpful, and answered her questions without making her feel foolish for calling.

Overall, the enrollment was quick, and the thorough training and support made navigating this new self-directed service a breeze. The tools are simple but sufficient to give me access to everything I need whenever it is convenient to me. I am beyond grateful for the help of this program and my caregivers who will help me remain living in my home which I love so much. I am glad to be partnered with an FMS who cares about taking care of my caregivers and who values my independence and way of life just as much as I do.

E.6. Data Access and Maintenance

Our web-based portal exceeds the requirements outlined in the Scope of Work, Section 2.5.3. On pages 128-141 of this proposal, we describe our web-based portal, **including our approach to meeting the reporting requirements outlined in Section 2.5.22 of the Scope of Work.**

It is with all our self-direction partners in mind, that Palco has built our cloud-native technology solution with an eye toward refining communication to customers, fine tuning the processes that streamline deliverables, decreasing errors, and increasing the efficiency of doing business. We know that the best work evolves from listening to our clients and having the established discipline to define the solution. **Palco understands that Arkansas and DHS stakeholders want a swift enrollment process, centralized budget repository, a user-friendly timesheet submission and processing portal, and a dependable payroll process.** As this section demonstrates, our system architecture enables compliance-based performance. Our solution does not require any software installation at user sites. We continually load-test to ensure we can handle volume with no downtime.

In short – our systems are designed for the implementation and growth – of any size program.

E.6.A. Web-Based Portal

Palco's Case Management Portal ® (CMP) is one reason we are the best FMS/Counseling Services partner in the sector. Palco's customizable cloud-based CMP is constructed from the backbone of 23 years of providing FMS to the self-directed population. Our software solutions are tailored to this industry, and even more so tailored to the specifications of the Arkansas DHS *IndependentChoices* program. **Our CMP streamlines budget, payroll, and claims processing as well as ties in data from other external-facing Palco applications: Intake ® (enrollment) and Connect ® (time entry), in one easy-access tool**.

Our cloud-based system is built to make a complicated system simple with real-time reporting, dashboards, and 24/7 access. Features include:

- ✔ Cloud-based FMS system with real-time reporting, dashboards, and 24/7 secure, remote access
- ✔ Near-zero downtime (for system maintenance)
- ✔ Integrated with the state's chosen EVV vendor system for Provider time entry
- ✔ Ability to apply different SUTA rates for each Provider, supporting individual tax rates
- ✔ Ability to support various budget allocation logic – Monthly, Daily, Annual
- ✔ Ability to run frequent Medicaid eligibility checks on all participants (active and inactive)
- ✔ Reporting features
    - o Ability to view paid and denied timesheets, and reasons for denial
    - o Ability to view budget utilization by participant
    - o Ability to view historical (worker) payment details, including paystubs

Our Case Management Portal (CMP) provides a comprehensive beginning-to-end detailed view of case information. It is a significant part of the Palco solution, and we believe a brief introduction to the CMP suite will provide a preliminary understanding to build upon throughout the rest of Palco's response.

The cloud-native Palco Case Management Portal serves as the multi-tenant repository for all program participant-related data and program business rules. It contains various modules for case management (records, member info), accounting (utilization, pay ledger/history, repository of pay rates and employer cost rates, exemptions, tax rates, Workers' comp, budgets), billing, enrollment, time entry, and reporting. See **Figure 22**.

Figure 22: Palco's Case Management Portal

Palco's CMP provides administrative transparency and immediate access to data from other external-facing Palco applications including Connect (time entry) and Intake (enrollment). **We have the capability to map user roles and permissions so that each user role (state program staff, Palco Counselors, DHS nurses, etc.) has a unique permission set giving them access to the information necessary to best support the self-direction programs in an efficient and successful manner.**

Technology has challenged Palco developers to provide cloud-based software with continuous delivery and an eye towards the user experience, as well as solutions that are configurable with the ability to meet increased demand (scalability). Palco and key leaders in Arkansas have collaborated to identify solutions that benefit all users. Because self-direction continues to evolve, we will continue to work with DHS leaders to define new program expectations and ensure our software solutions meet the demand.

State Benefits:

- Secure, remote on-demand access to information
- Credentialing for tailored access/permissions for staff at many levels
- On-demand analysis and reporting
- Dashboard views of trends and data
- Enter referrals and budget Service Authorizations directly into CMP (eliminate manual process, i.e., spreadsheets)
- Service Authorization and Billing Management and Support

Self-Direction Participant/Representative and Employee Benefits:

- Online / Electronic Enrollments
- Ability to complete all Palco and government forms online
- Time entry and approvals
- Integration with EVV
- Visibility on budget utilization for employers
- On-demand access to paystubs
- Visibility on paid and denied timesheets, reasons for denial

With Palco as your partner, our Case Management Portal (CMP) will remain accessible to DHS program staff and Palco Counselors and will be enhanced and extended to other DHS identified users (like DHS Nurses), as needed.

Our focus is on your self-directing program participants. We understand the public fiduciary responsibility we are all tasked with, and we take it seriously. Along with providing a portal built with exceptional user experience at the forefront, our goal is to provide a barrier-free, no hassle experience enhancing the business relationship.

Palco's Case Management Portal (CMP) provides a detailed view of a participant's journey from enrollment to monthly budget management – and so much more. Users attain dynamic case handling tools for real-time contextual case management access and processing information.

Every program has unique requirements. New modules within our CMP are configurable. For example, in Arkansas, our CMP system is configured to house Arkansas program-specific data like waiver type and provider identification numbers for every individual self-directing employee. We are also integrated with several State specific systems such as the State MMIS system for receiving budget funds and the State Electronic Visit Verification (EVV) solution for in ingesting of time captured data.

We strive to make our software products as accessible as possible. Our self-direction software solutions are accessible and operable on standard hardware operating systems and browsers, with no need for on-site user installation.

CMP ACCESSIBILITY

We strive to make our software products as accessible as possible. Our self-direction software solutions are accessible and operable on standard hardware operating systems and browsers, with no need for on-site user installation.

Palco's Case Management Portal (CMP) is accessible 24 hours a day, 365 days of the year with scheduled maintenance, and disaster recovery testing, occurring per agreed upon scheduling. Our disaster recovery capabilities meet the demands of the recovery time objective, and recovery point objectives outlined in Section 2.5.3 of the RFP. Palco assumes all responsibility for the maintenance of our platform, operating system, network configuration, and application software.

We will continue to provide bug fixes, routine security upgrades, and new features developed specifically to support the Arkansas self-direction program, at no additional cost to the state agency.

KEY ELEMENTS OF CMP

- **Case Management Processing** which assures business rules and procedures are followed and appropriate notations are made in the system.
- **Automation** of various processes for all users in a full stack system reduces errors, increases efficiency, and frees time to focus on more complicated tasks and positive self-directed results.
- **Data Discovery** improves informed decisions by streamlining multiple records into a single record. Palco's CMP suite is fully Health Insurance Portability Accountability Act (HIPAA); Health Information Technology for Economic and Clinical Health Act (HITECH); the Arkansas Personal Information Protection Act compliant.
- **Audit Trail** brings referral, enrollment, budget, spending, and accounting together into a complete case solution. See **Figure 23**.

Figure 23: Palco Case Management Portal
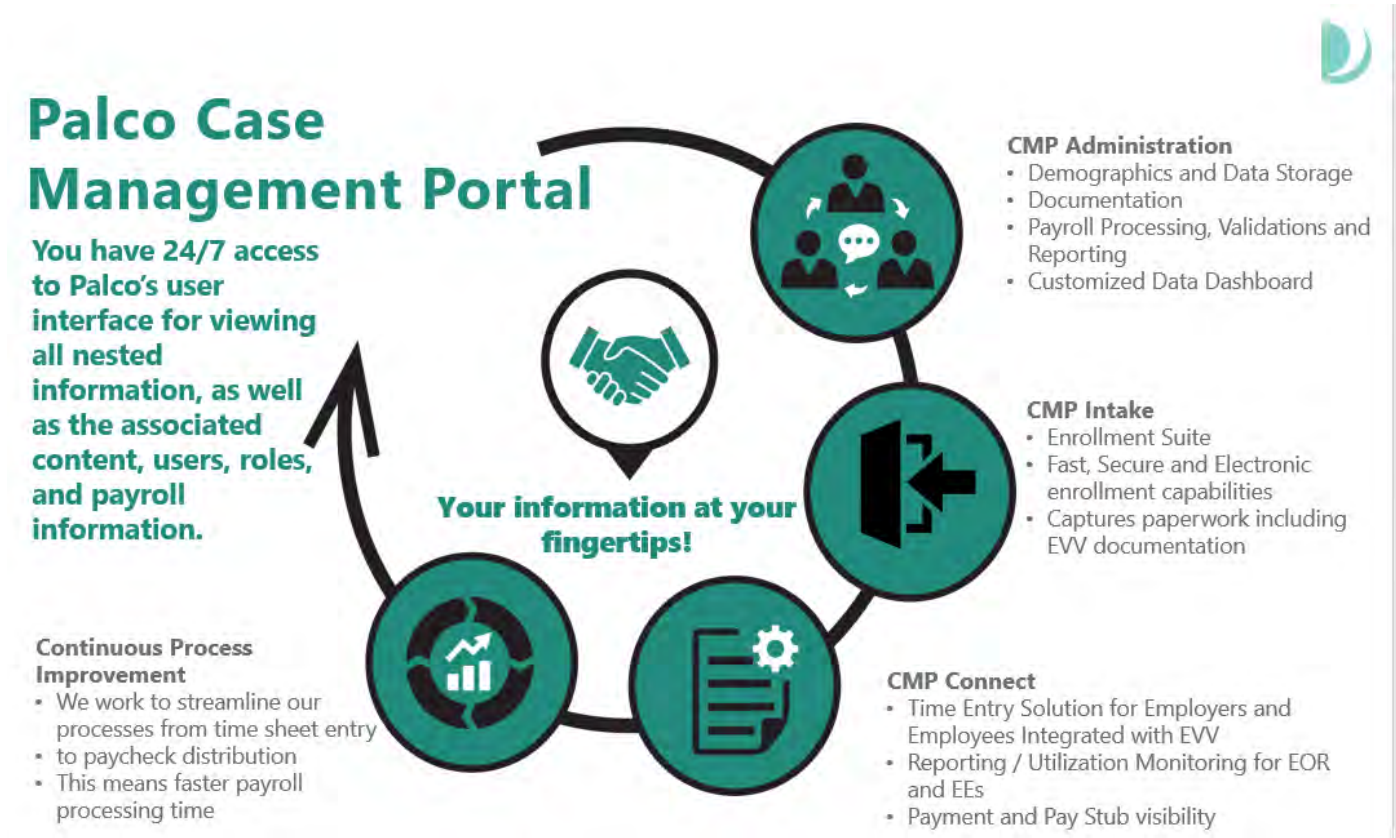
Palco's Case Management Portal (CMP) is designed with secure multi-level access points that are tailored to every specific user and the scope of what data they should see. These two areas are referred to as the user's permissions (**what** they can see) and their caseload (**who** they can see). For example, DHS program staff overseeing program operations as a whole may need to see all Participants on a program whereas a Palco Counselor or DHS Nurse may only need to see Participants in assigned to their caseload. Caseloads are built with layers/hierarchy as illustrated in the **Figure 24** below.

Permissions are customized based on each individual user and the tasks they need to perform. **For example, an Palco Enrollment Specialist who is processing paperwork can edit a field such as address or phone number within a Participant record whereas a Palco Customer Support Representative can only view this information.**

Figure 24: Example of a Caseload Hierarchy
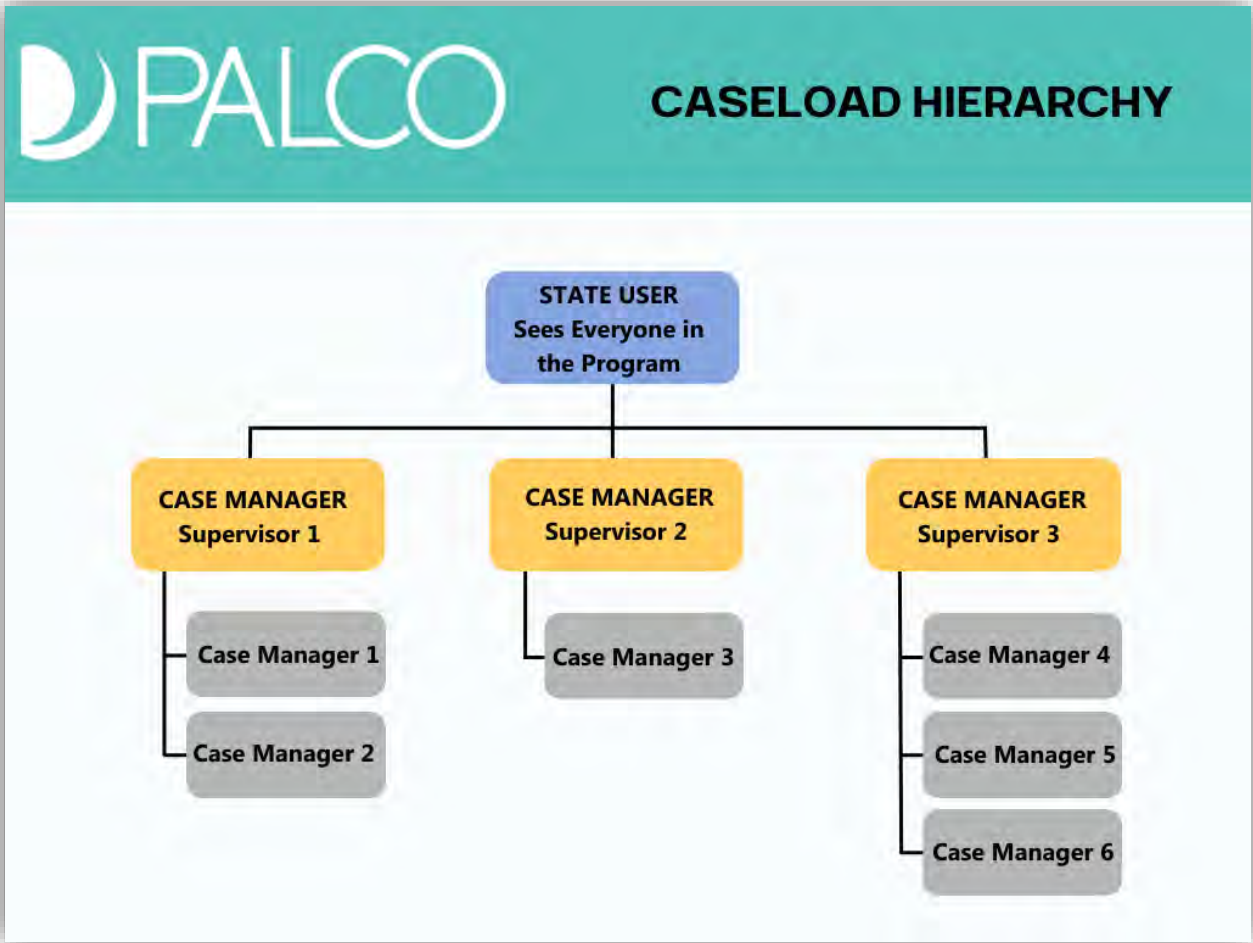
Our Case Management Portal (CMP) is accessible to internal Palco staff and external DHS staff. The CMP provides transparency and immediate access to data from other external-facing Palco applications including Connect (time entry) and Intake (enrollment).

Participant flow can be viewed from referral to accounting, as seen in **Figure 25** below.

Figure 25: CMP Participant Flow
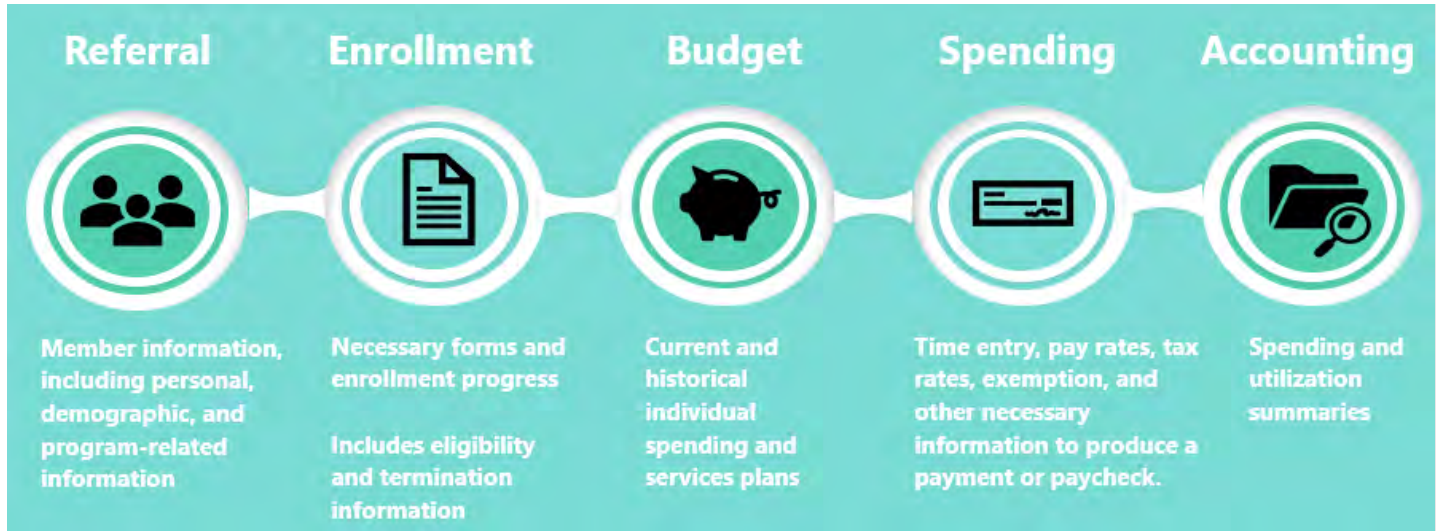
Our staff of Certified Public Accountants provide exceptional oversight. Palco's solutions provide additional benefits to the State in that they are configurable to address Arkansas's tax codes. Palco provides experienced, proven financial management services and a cloud-native software under one roof. Our software is modularized, and packages are configurable:

- ✔ Case management portal (CMP), which includes a robust budgeting and authorization system that integrates with our payroll solution.
- ✔ Enrollment and Intake module.
- ✔ Online time entry with integration to our EVV partner and the chosen aggregator.
- ✔ Reporting application.
- ✔ Billing and eligibility software.
- ✔ Full System back up for 30 days+.

Service documentation is currently configured to view:

- ✔ First name, last name, and either middle initial or date of birth of the participants and their surrogate Employer, if applicable.
- ✔ Date and time of service, including a.m./p.m.
- ✔ Electronic signature of the Employee per Arkansas Code Annotated § Title 25, Chapter 31- Electronic Records and Signatures; and
- ✔ Service type.

Every State has unique and different requirements, as well as every partner's user team. Modules within our CMP are configurable. For example, in Colorado, case managers create budgets within the CMP system. Some of the administration features are seen in **Figure 26** below.

Figure 26: CMP Administrative Features
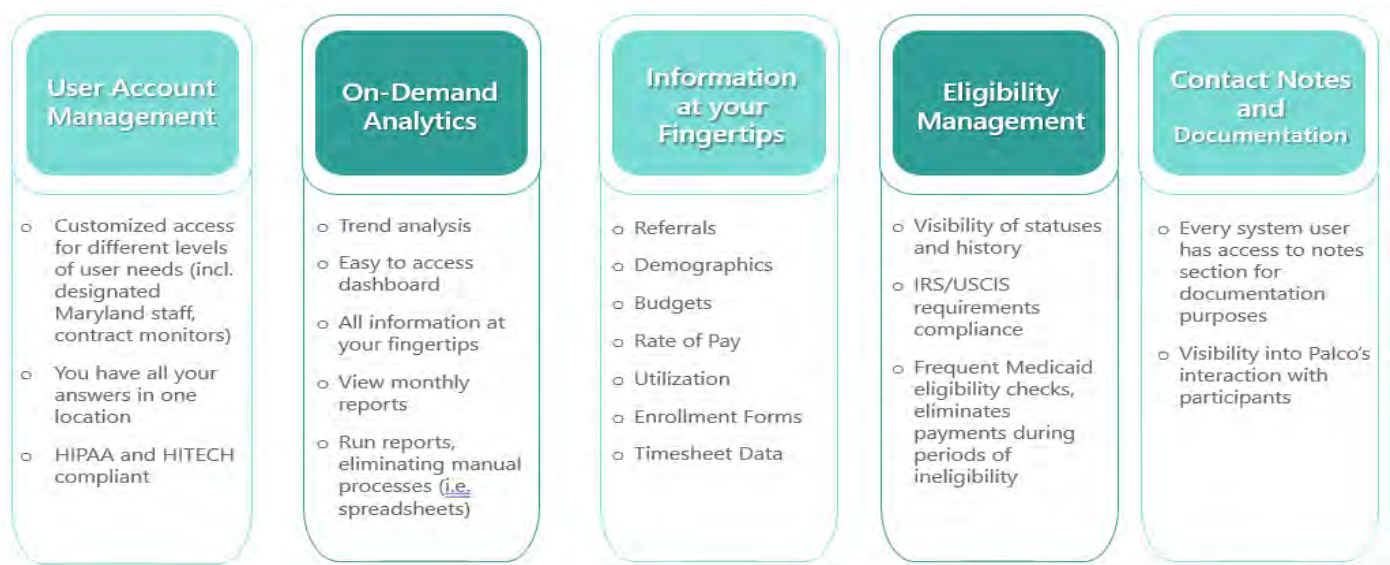
CMP Enhancements for Arkansas Self-Direction Program(s)

As Palco and the State of Arkansas embark on the next phase of our long-standing partnership, we look forward to continuing development and rolling out new features of our Case Management Portal (CMP) to benefit the *IndependentChoices* program. New features we look forward to discussing with DHS program staff and your extended stakeholders include:

- ✔ Role-mapped permissions for DHS nurses and other support staff
- ✔ On-demand reporting and real-time dashboards
- ✔ Integration of the Arkansas Task and Hours Guide with our CMP Budgeting tool
- ✔ Integration of employment clearance registry checks and criminal background checks with our CMP system
- ✔ Integration of real-time participant eligibility checks via a 270/271 process with the Arkansas MMIS
- ✔ In-depth needs and goals assessments for program participants, delivered by their dedicated Palco Counselor
- ✔ Integration of activity codes captured in AuthentiCare and merged into the Palco Connect and Case Management Portal, displayed as service documentation at the timesheet shift level

On Demand Reports and Dashboards

The Palco Case Management Portal (CMP) includes a reporting suite giving professional users access to run reports on demand and derive real time case metrics and analytics to ensure a continuity of care from DHS staff to Palco Counselors. Reports will be provided on the first calendar day of the month following the last reporting period and will be delivered in a mutually agreed upon format.

We are excited to introduce real-time dashboards with on-demand access to Palco's CMP, including budget spending summaries with authorization period, budget amount, dollars utilized by date of service, and percent remaining.

Our web portal's business intelligence layer provides the ability for users to generate ad hoc reporting in real-time. This is done through the application and design of filters, which are grouped by users into a report builder. This allows users to essentially build their own queries with the use of available data elements to generate reports on demand. Palco provides information and training materials on this functionality.

We will customize any reports, as instructed by DHS, which are capable by sorting by date range essential to maintaining program integrity and quality through tracking and monitoring. All reports will include data for Beneficiary's in all Self-direction programs and will be distinguished by program. Reports will be generated weekly, monthly, quarterly, annually, or on an ad hoc basis and cover all areas of VF/EA FMS tasks. The State will have access to collected data through the life of the contract.

Palco is uniquely positioned to maintain FMS support for the State. Palco has enhanced the entire FMS solution based on client feedback throughout the years, adding mobile verification capabilities, enhanced system reporting, and data aggregation.

Palco maintains service documentation and monthly summaries for at least five (5) years, with data viewable in our Case Management Portal (CMP). All timesheet entries are captured and documented, and information is editable and viewable by the Employer. Palco restricts access and possession to employees and all Palco personnel is trained on confidentiality.

We have a standard suite of reports available for our external partners in our Case Management Portal (CMP). These are accessible for all professional users 24/7, as on-demand reports. See the **Table 1** below for a description of these core reports.

Table 1. Standard Reports available in Palco CMP

Standard Report Name	Description
Active Enrollments	The Active Enrollment report identifies CMP Members (Participant, Worker, or Employer of Record) active during the date range specified along with their current Case Status. Users enter a role and a date range to see Members active during that time.
Authorization Report	Authorizations in CMP are specific services and goods budget categories. The Authorization Report allows end users to pull both broad and refined lists of Authorizations from CMP. Congruent with the User's Role and scoped permissions, users may search for data across entire programs and with widely defined budget date time frames.
Employer Rate and Registration Report	The Employer Rate & Registration report lists Federal and State tax rates, unemployment insurance costs, and worker's compensation costs for

Standard Report Name	Description
	Employers. These rates are applied to worker wages based on program, state, and federal requirements.
EVV Registration	The EVV Registration report provides a list of workers and details about the worker's EVV compliance. It shows if the worker is required to use EVV, and if so, how they submit their time. It is particularly useful in gauging overall compliance and narrowing down workers who are out of EVV compliance.
Member Contact	The Member Contact report shows current contact information for Participants, Workers, or Employers of Record. Palco maintains physical and mailing addresses, email addresses, and phone numbers.
Member Statuses	Member statuses produces a list of participants, employers of record, and workers with their Case Status as of the date selected by CMP End User. Member statuses helps CMP users understand which Members are currently active, inactive, or pending. It shows how long a Case status has been in effect and helps CMP users review historical statuses.
Missing Timesheets	The Employee Missing Timecard report provides a list of active workers who did not submit a timecard for a specific pay period.
Participant Support	The Participant Support report lists all participants within a Program and their immediate support within that Program, be that a Palco Counselor or Enrollment Specialist, or other support role.
Payables Register	The Payables Register lists payments and reimbursements to Vendors for services and goods different than timesheet and timecard entries. It includes all payments within the service date range selected, including those in progress and rejected. The report includes Participant, Employer, and Payee IDs and Names, the service and cost, the Payable's present status, and additional reference information.
Payment Method	The Payment Method report identifies how Workers, Participants, and Employers are paid, if they receive paper checks or electronic deposits for funds sent to them. Account details are not displayed
Payroll Register	The Payroll Register report shows information about what was paid to workers on a given pay period, including deductions and exemptions and the payment method. CMP Users can specify a date range for inclusion, as well as limit results to a specific Participant or Worker. This report produces summarized pay information and calculates gross wages overall.
Payroll & Tax Info	The Payroll and Tax Info report displays rates, exemptions and other statuses that affect a worker's Payroll and Tax withholdings. The report includes factors affecting pay, such if the worker is exempt from Overtime pay and Difficulty of Care.
Start Date Report	The Start Date Report shows two types of Start Dates. It shows the original date that a Member (Participant, Employer, Worker) started in a Program, and it also shows a 'Restart' date, which is the most recent date the Member became active again. The Restart date is shown whenever a Participant, Employer, or Worker's profile has changed from Active to Inactive and back to Active.
Timesheet Report	The Timesheet Status report gives CMP users the ability to see the bigger picture and overall progress of timesheets within a Program. It also gives CMP users shift level specifics across a range of workers, employer, and participants. This report lets the user narrow down results listed by

Standard Report Name	Description
	Timesheet status. In doing so, the user can isolate timesheets with concerns or that need action such as Worker or Employer review. If the timesheet failed, the reason for that failure is identified.
User Demographics	The User Demographics report shows essential and basic information about Participants, Employers of Records, and Workers. This report identifies the name, relevant IDs, current Case Status in CMP, gender, zip code, and date of birth of the Member listed. Workers on the list also show their relationship and shared dwelling status with participant.
Vendor Info Report	The Vendor Info report is a demographic report containing active, complete Vendors in CMP. Vendors are individuals and companies that produce an invoice or bill for payment, or where reimbursement is needed. Importantly, this report also lists the Vendor's tax ID.

Palco looks forward to reviewing this standard suite of reports, readily available in our Case Management Portal for DHS program staff to query on-demand, 24/7. These reports meet many of the reporting needs outlined in the RFP. **Palco currently supports the data requested in the program-specific reporting requirements outlined in the Scope of Work, Section 2.5.22.** We look forward to working with the state on report formatting and delivery. Examples of these program-specific reports are outlined in **Table 2** below.

Table 2: Program-specific Reports

Report Name	Description
Weekly Pre-Enrollment and Enrollment Report	Weekly submission to DPSQA tracking the enrollment process for prospective participants. ✔ The participant's name; ✔ Date of referral; ✔ Palco Enrollment Specialist's name assigned to assist the participant; ✔ Status of required paperwork, including back-up plan; and ✔ Status of worker identification and readiness.

Monthly Referral and Enrollment Report	This report will provide at a minimum:
	 ✔ Total number of referrals received;
	 ✔ Total number of participants enrolled in the program differentiated by actively receiving services and pending services; and
	 ✔ Total number of withdrawals from the program with an indication if withdrawal occurred prior or after service initiation, and the reason of withdrawal.
	      o Number of days transpired from referral (date referral is submitted to Palco by DHS) to initiation of services:
	      o Average number of days from referral to initiation of services;
	      o Range of days from referral to initiation of services (least to greatest);
	      o Listing of each participant for whom services have not been initiated within sixty (60) days and an explanation as to why these services have not been initiated;
	      o Listing of each participant for whom Employer Enrollment, including the identification of a backup plan, have not been completed within

Report Name	Description
	fourteen (14) calendar days and an explanation as to why these services have not been completed; and a o Listing of each Potential Employee for whom Employee Enrollment, including the completion of required character checks, have not been completed within sixty (60) days and an explanation as to why.
Monthly Beneficiary Count Report	This report will provide at a minimum: ✔ The total number of participants; ✔ The participant's name; ✔ Most recent date of contact by Palco Enrollment or Counseling staff; ✔ Palco Enrollment or Counseling staff assigned to assist the participant; ✔ Total number of participants with eligible family members hired as Worker(s); ✔ Name of the Employer of Record (EOR) for the participant; and ✔ List of all new EOR's appointed between the 1st to the last date of the previous month.
Worker Report	This report will provide at a minimum: ✔ Names and identifying information of all Employees who provided services to more than two (2) people who self-direct their services in any HCBS program and the name of those participants; ✔ Total number and list of Employees active, pending, or disenrolled for each participant; ✔ Date of change in status for each Employee; and ✔ The participant's back-up plan with status of informal or formal.
Monthly Enrollment Team Report	The report must include the previous month's information to include, but not limited to, the following: ✔ The tenure of the Arkansas dedicated staff. ✔ Signed attestation of character check compliance for any new Arkansas dedicated staff hired between the 1st and last day of the previous month. ✔ The Enrollment staff-to-beneficiary ratio. ✔ The counselor-to-client ratio for each county. ✔ The number of counseling visits including method of the visit. ✔ The number of participants reassigned to a different Enrollment staff, broken down by changes requested by the Participant/Employer and those initiated by Palco; and ✔ For participants, the current status of the participant's case (i.e., new enrollment, active, or turnover/transition assistance).
Monthly Customer Service Report	This report will include at a minimum: ✔ Number of calls received. ✔ Number of calls received per participant's account. ✔ Percentage of abandoned calls. ✔ Average time to answer calls. ✔ Percentage of calls answered within thirty (30) seconds. ✔ Average length of time on hold. ✔ Average length of time on each call.

Report Name	Description
	✔ Number of voice messages received.
	✔ Number and percent of voice messages returned within one (1) business day.
	✔ Number of dropped calls; and
	✔ List of reasons for each call and number of calls per reason.
Monthly Beneficiary Utilization Report	This report will include at a minimum:
	✔ The participant's name;
	✔ Date of referral;
	✔ Participant ID number and indicating, if applicable, the date of withdrawal from the self-direction program;
	✔ Services authorized and rate per service for each Employee and if the Employee is a family member;
	✔ Total dollar amount used of the monthly capitation and balance remaining for each Beneficiary;
	✔ Total authorized hour amount of each service type available, used, and remaining for each Beneficiary;
	✔ A bar graph of percent (%) elapsed and percent (%) remaining for each service; and
	✔ Identification of Beneficiary enrolled in Self-Direction Management Service who incur no utilization of services for a period of at least thirty (30) consecutive calendar days including reason for underutilization.
Monthly Critical Incident, Reportable Event, Reportable Incident Report	This report will include at a minimum:
	✔ The number of Critical Incidents, Reportable Events, and/or Reportable Incidents overall and by Beneficiary, EOR, or Employee and type of event; and
	✔ The resolution and timeframes for resolution of identified issues by program, including whether the Contractor or Beneficiary took any action on a reported incident or event.
	*Critical incidents will be reported immediately.
Monthly Other Goods and Services Report	This report will include at a minimum:
	✔ The total number of Beneficiaries utilizing other goods and services.
	✔ The amount expended.
	✔ The category (Discretionary Funds or Savings).
	✔ Detail of items purchased; and
	✔ The Beneficiary's total budget
Monthly Electronic Visit Verification Report	This report will include at a minimum:
	✔ The staff providing services.
	✔ The type of service provided.
	✔ The individual receiving service.
	✔ The date the service was provided.
	✔ The location of the service delivered; and
	✔ The time the service begins and ends.
	*Also include a list of Employers and their Employees who retroactively adjust shift start and end times.

Report Name	Description
Quarterly Participant Group Advocacy Report	The department will be provided an advocacy report to include: ✔ Names of each person participating in the Contractor's Participant Advocacy Group and their respective roles. ✔ Description of date, time, and location of the most recent quarterly meeting that occurred; and ✔ Brief narrative description of the items discussed at the meeting, including questions and concerns discussed, recommendations for improvement, who was responsible for responding to each respective inquiry or concern, how each item will be addressed, and timeframes for addressing all items raised at the meeting.

E.7. Cash Expenditure Plan

Throughout the following section on pages 142-150, we will **demonstrate how our solution exceeds the State's requirements for development, management, and reporting on the participant's Cash Expenditure Plan as outlined in Section 2.5.11 of the Scope of Work,** including a thorough description the budget tool integrated into our Case Management Portal (CMP).

E.7.A. Cash Expenditure Plan (CEP) Budget Requirements

Program participants assert budget authority, allowing them to choose how they want to use the money and hours which have been allocated to support their needs as assessed during an independent, third-party assessment conducted by DHS or another vendor.

Palco is responsible for providing an electronic biweekly Cash Expenditure Plan (CEP) budget template, representative of the assessment, to the Counseling staff for completion in the home setting. The CEP template provided to the Palco Counselor includes the employer tax rate, a space for hourly calculations and narrative input by the Counselor. The narrative space allows for entry to describe how purchased items will meet a goal on the employer's plan of care to lessen human dependency needs or sustain current functional ability.

The template includes the funds available to the participant by day, which is referred to as the daily rate. The daily rate is calculated by multiplying the assessment hours by $10.54 and dividing the result by 7. For each biweekly CEP, the total funds available are calculated by multiplying the daily rate by 14.

Once the Palco Counselor and Participant/Representative develop the CEP, it is automatically recorded in CMP Admin as a pending CEP. The CEP is reviewed for accuracy before being transmitted electronically to DPSQA for approval. A finalized copy of the CEP is provided to the employer through email or mail based on the preference of the employer. Palco processes payments for goods and services authorized by the CEP. Payments for goods or services that exceed an employer's CEP cannot be processed.

DPSQA uses the authorized CEP as a guide to begin the flow of program funds for the participant's payroll and other budget expenses from Medicaid.

RECEIVING PROGRAM FUNDS

Participant funds are disbursed by Arkansas' Medicaid fiscal intermediary (DXC) and are received by Palco the Thursday following the last Thursday of the previous month. Generally, the funds received cover services to be provided during the month they are received. However, funds received may be applied to previous month's services when a change has been made to the participants CEP retroactively. DXC uploads a report of the funds to the provider portal each month along with weekly reports referred to as the "200" reports.

The Palco ID is added to the report by comparing the Recipient Base ID to the Base ID stored in CMP Admin. Each RA report is saved as an Excel Worksheet in the appropriate year and month folder.

Adjustments to the CEP

Hours available to an employer and employee in CMP Admin must reflect changes in enrollment status, hospital and rehab visits, overpayments, and holds that may be placed an account. After making an adjustment, CMP Admin calculates the available hours remaining for the pay period that the adjustment effects. The most common types of adjustment are:

- ✔ Hospital Stay: Caregivers cannot claim hours during a participant's hospital stay. The date of admission and date of discharge will only be paid if the caregiver provides proof the services were performed before the time of admission or after the time of discharge when the timesheet is submitted.

- ✔ Rehabilitation and Nursing Facility Stay: Caregivers cannot be paid for hours on any day that the employer was in one of these facilities, even if the hours were worked before or after the admission/discharge times.

- ✔ Disenrollment: If the date of a participant's disenrollment from the program is effective on a day other than the first day of a biweekly payroll period, the days in the pay period after the disenrollment date must be adjusted.

- ✔ Reenrollment: If the restart date is any date other than the first day of a payroll period, the days before the start date must be adjusted. If the restart date falls within the same period as the disenrollment date and an adjustment was made for the disenrollment, the previous adjustment must be deleted and a new adjustment must be made to reflect the days the participant is enrolled on the program.

Palco CMP Budget Tool

CMP is configured and customized to meet the needs of the Arkansas self-direction cash expenditure plan/budget requirements. These customizations include the ability to accommodate both a monthly budget and daily rates, as needed. Full integration of this budget tool with the payroll processing and validation suite of the Palco CMP ensures that all payroll is validated against the Participants approved CEP/budget before paying.

Our CMP budgeting suite provides centralized access to enter, update, and inquire about the status of authorized services. Our budgeting module is the hub to which all payment requests, timesheets, and billing point. In fact, our budgeting application drives the services that are selectable via EVV or Connect time entry.

CMP ADMIN

CMP Admin is the main system interface for all demographics and data storage. Capabilities include payroll processing, validations, reporting, and budgets. Data permissions are customized based on different levels of professional access. Real time visibility of time entry, payments, spending history, utilization, enrollment, and demographics are available to professional users 24-7. This system is only accessed by professional users (not employers or workers).

Workers are limited to view and select only services they are enrolled and approved to be providing to that participant. Additionally, system controls prevent billing for items not authorized on the plan.

More than any other area of our application, we have invested in the Service Authorization module to meet the needs of all of our programs nationally, which all look very different. Our module is extremely flexible because it needs to be. With each Service Authorization, we capture the following information and more:

- The overall Service Authorization span term (e.g., biweekly, monthly, annual).

- Each individual Service Authorization line-item date spans, which may be different from the overall span (e.g., you may have a line item that is authorized for 18 days, but an overall span that lasts for a year).

- The status of the overall budget and each line item. This allows you to disable services on the plan that are no longer being used, without having to disable the entire authorization or enter a new authorization into the system.

- For each line item on the plan, the service code will be entered, as well as any billing modifiers so that the billing information stays intact from point of entry through timesheets and on to the billing system.

- Budgetary limitations will be entered on the entire Service Authorization, on groups of line items, or on individual line items. These limitations will be in terms of dollars, units, or both. If units are selected, we support varying unit lengths – 15-minute units, hour units, and daily units.

We try to avoid issues on the front-end. Our Service Authorization module is embedded with controls driven by program rules, as defined in our backend rules engine.

- When budgets are entered, the system performs mathematical checks to compute payroll costs, considering the employer's unique tax rates. Upon contract award we will configure the DHS DPSQA system for Arkansas tax rules. Items that do not "math out" generate an error message for the user and prevent the Service Authorization from being saved until they are resolved.

- Limitations on overtime or other programmatic limitations, such as timely filing for billing purposes, will be defined on the Service Authorization. System alerts will be customized to prevent or simply alert users attempting to sidestep those rules.

Graphic user interfaces are another important feature of the Service Authorization module. Budgets are often complicated, with line-item services turning off and on during a span; different line items following a different pattern than the overall budget (e.g., Personal Care is biweekly, but the overall budget is monthly); and line items having different measurements (e.g., units v. dollars). Over the past two decades, we have learned some tricks on the best way to display this information.

With Palco, DHS receives access to a state-of-the-art budgeting tool. We have the capacity to integrate the state's task and hours guide into our budget tool, similarly to our Colorado CDASS budget calculator. This is a good example of how we can accommodate a sophisticated task and hours setup to determine budget allocations including daily rates that compute into a monthly and annual allocation. This gives DHS Nurses the ability to manage the participant's budget during annual renewals or periodic budget adjustments. Providing DHS Nurses access to our Case Management Portal

would also provide assurances that enrollment, payroll, and other pertinent tasks are occurring timely. This could be their one-stop shop for managing their self-directed caseload.

Palco is familiar with the goods and services aspect of self-directed services and currently provides purchasing services in multiple programs. Palco values the importance of assisting individuals with meeting their needs and obtaining the items necessary to ensure they maintain their independence.

Palco will ensure that the process of conducting transactions complies with Department policy and that referred participants will have the ability to make approved purchases of items and services detailed in their Cash Expenditure Plan. We will also:

- Maintain the Participant's CEP/budget in a centralized repository.

- Utilize a financial system that is approved by the contract monitors to ensure compliance with General Accepted Accounting Principles (GAAP):
    - o Track Medicaid funds budgeted, received, disbursed, and remaining on an individual and aggregate basis.
    - o Provide reimbursement to the participant's self-directing employee(s) and vendors, if necessary.
    - o Provide balance and payment information to Participants/Representatives via the Palco Connect system.

- Directly purchase vendor products or services approved on the PCP/POS and authorized by the counselor, participant, support broker or authorized representative and provide invoices within three business days for the purchases to the department.

- Submit a monthly report to the contract monitors and their designees, if applicable, participants, and support brokers detailing by program:
    - o all payments made on behalf of individuals/participants, broken down by dollar amount.
    - o the item(s) or service(s) purchased.
    - o the date of purchase(s).
    - o the payment method(s).
    - o the vendor(s) to whom payment was made.

- Keep records of vendor transactions and provide them to the Department upon request.

- Participate in audits and/or reviews of payments conducted by the contract monitors. Palco will be financially liable for any transactions found to be unallowable including, but not limited to:
    - o Items purchased that are expressly prohibited.
    - o Items not on an approved PCP or POS.
    - o Items purchased for an ineligible individual/participant.
    - o Items that are missing receipts; or

    o   Payments to ineligible employees.

Through our years of experience in Arkansas and multiple states across the country, we understand how critical the setup and revision of budgets is to ensure a successful payroll. Within our solution, the budget is configured as the hub to which all payment requests and timesheets point.

Our cloud-based budget module was built to be entirely flexible to support each participant's unique plan. It has the following features that are present that are applicable to configuration set forth at the program level, participant budget level, and individual budget line-item level:

- Statuses (e.g., Pending, Under Review, Approved, Rejected)
- Start dates
- Expiration dates
- Category of services, including payroll costs and non-payroll goods and services
- Number of units, if applicable
- Dollar amounts, if applicable
- Funding allocated to employer costs associated with payroll, such as federal and state taxes
- Period lengths (e.g., daily, weekly, biweekly, semimonthly, monthly, quarterly, annual)
- Recurrence

Each individual budget contains additional information about the participant and his or her qualified workers, linked vendors, and needs and goals associated with receiving the service. Palco's budget system allows for linking of qualified workers and vendors to certain service types. For example, in some states, workers must provide credentialing to demonstrate their ability to perform certain enhanced services. Credentialing is loaded in our system, and the worker is then linked to that service type. As a quality measure, our system automatically disables any non-qualified workers from being able to submit their time for such services.

Access to the budget module is authenticated upon login. Authorization is based on criteria, such as role(s), programs, or individual claims on a per user level. Users with the credentials to access the budget module are assigned either Read or Edit abilities:

- **Read Mode** allows access to the budget for inquiry only. Users view a detailed history of budgets utilized in the past but are unable to make modifications or changes to the budget.

- **Edit Mode** provides the same access as Read Mode, but users can also make changes and submit revisions. Some elevated users can disable budgets. For instance, in our Colorado program, external Case Managers have access to input, view, and make changes to budgets in the Palco system. Case Manager views are limited to their participant pool to ensure the security of protected health information. With this integration, Palco and external users will collaborate and connect on information needed to support the client's services. Note that each program we serve has a different interface customized to that program.

Palco will provide configurable views to support additional functionality within the budget. Initially, budgets may be input manually or via electronic batch submission, such as during transitions. Such batch submissions are inserted directly into our database after sufficient quality checks, thereby reducing downtime of budgets. These budgets typically contain, but are not limited to, the following information:

- Medicaid Participant's name and ID, if applicable
- Beginning and ending date of the budget
- Whether this is a new budget
- Whether this budget is a revised, modified, or terminated budget
- Type, number of units, and dollar amount allowed for payroll-related services
- Type, number of units, and dollar amount allowed for non-payroll-related goods and services
- Associated needs and goals

Revisions are created from an original budget through the Revision worksheet. For convenience, the prior budget is also shown in History for comparison. A revision date is entered, and the budget is then tagged as having been revised. A history of what was changed, when, and by whom is also associated with the revised budget. See **Figure 27 and 28** below.

Figure 27: Budget Screenshot
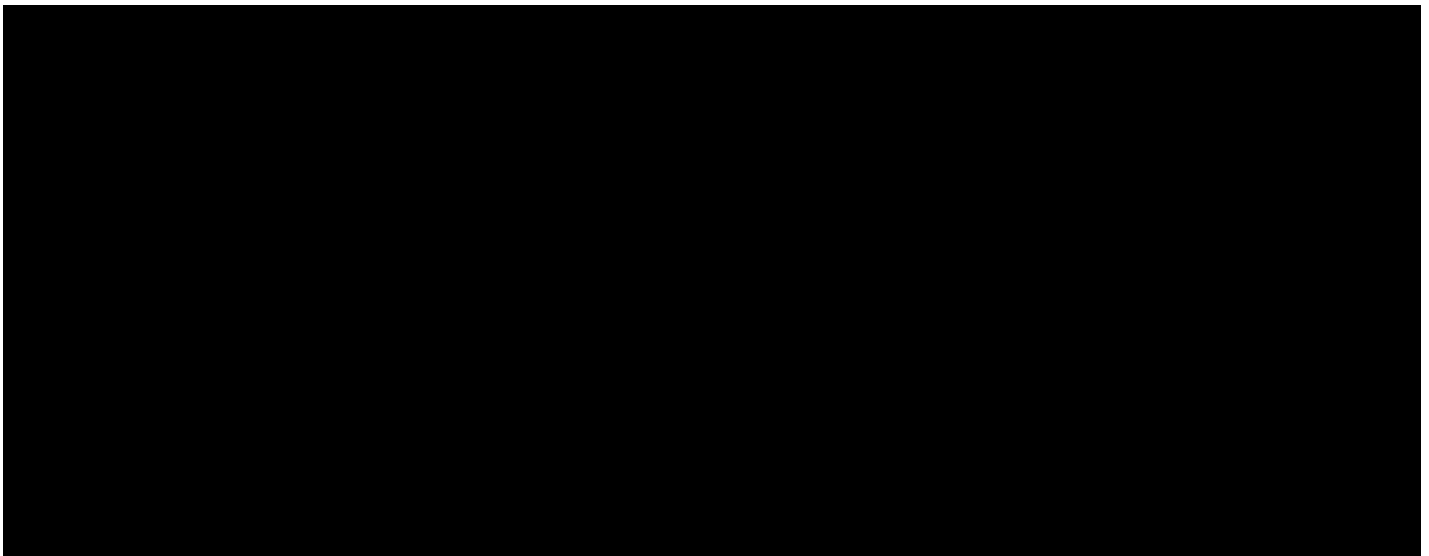
Figure 28: Budget Revision Screenshot
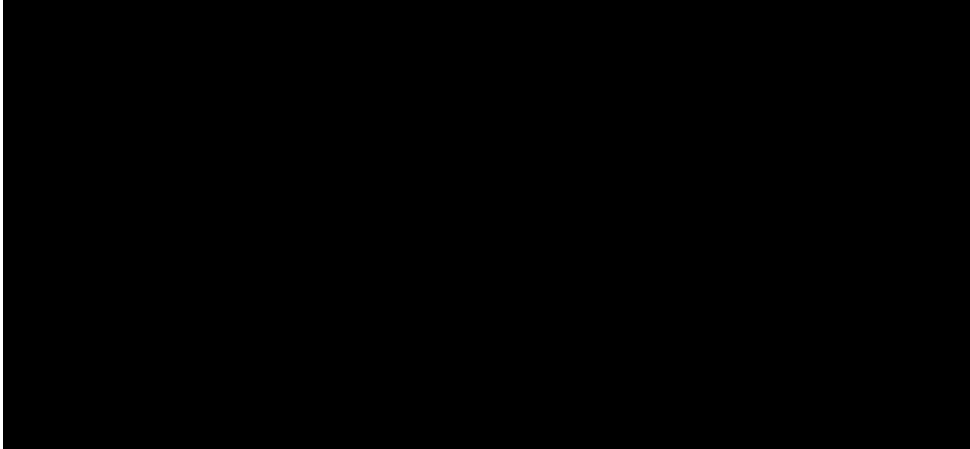
Inquiries into the budget are viewed by professional users with Read or Edit level system access. Users may also accesshistorical budgets. The inquiry view is in the same format as the screenshot above, providing all necessary information in one place for the user to answer questions and assist participants and their representatives.

Our solution generates automated email notifications to participants, workers, external stakeholders such as the DHS RNs, and DHS program staff once budgets are entered. Using the workflow and queuing processes, if a Service Authorization is nearing expiration, automatic email notifications are generated to facilitate timely renewal. These notifications are configured to send at varying intervals – 1 week, 30 days, 60 days, etc.

When a client has exhausted their budget, we reimburse any valid portion of the timesheet when possible – or "pay to the limit." Hours attributable to exhausted funds are split from the original timesheet and routed back to the user for correction. This was a critical feature utilized during the EVV implementation of Spring 2021 by Palco to alleviate some pain points and issues DHS program staff were experiencing. The ability to receive at least a partial payment was a huge benefit to caregivers struggling to learn the new technological system and comply.

BUDGET SPENDING MADE EASY

It is Palco's goal to make budget utilization transparent and easy to follow. Through the Connect portal, budget spending summaries and payment details are accessed by Employers to allow them real time management of their worker/caregiver schedules and hours, a critical piece of the self-directed service model. DHS program staff view this same information in Palco's Case Management Portal

Spending summaries are viewed using two different display options, by budget plan or tailored to a specific date range like a specific pay period. The view will also be changed from allocated spending (funds) to units and hours. See **Figure 29, 29a and 29b** for an example of a spending summary dashboard. The top row displays the current budget year, while the second row lists the service authorization and the starting allocation or budget for that authorization. Dates of service are shown with the specific spending/utilization that occurred on those dates. Total spent/utilized year-to-date is captured along with the budget funds remaining and the percent utilized year-to-date.

Figure 29: Utilization Spending Tab
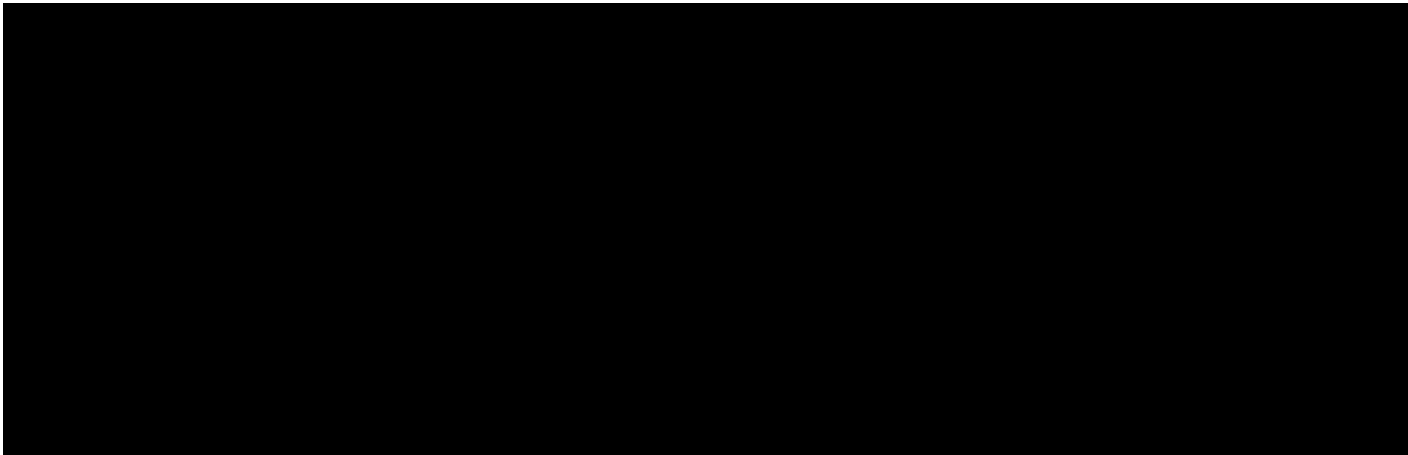
Figure 29a: Budget by Funds
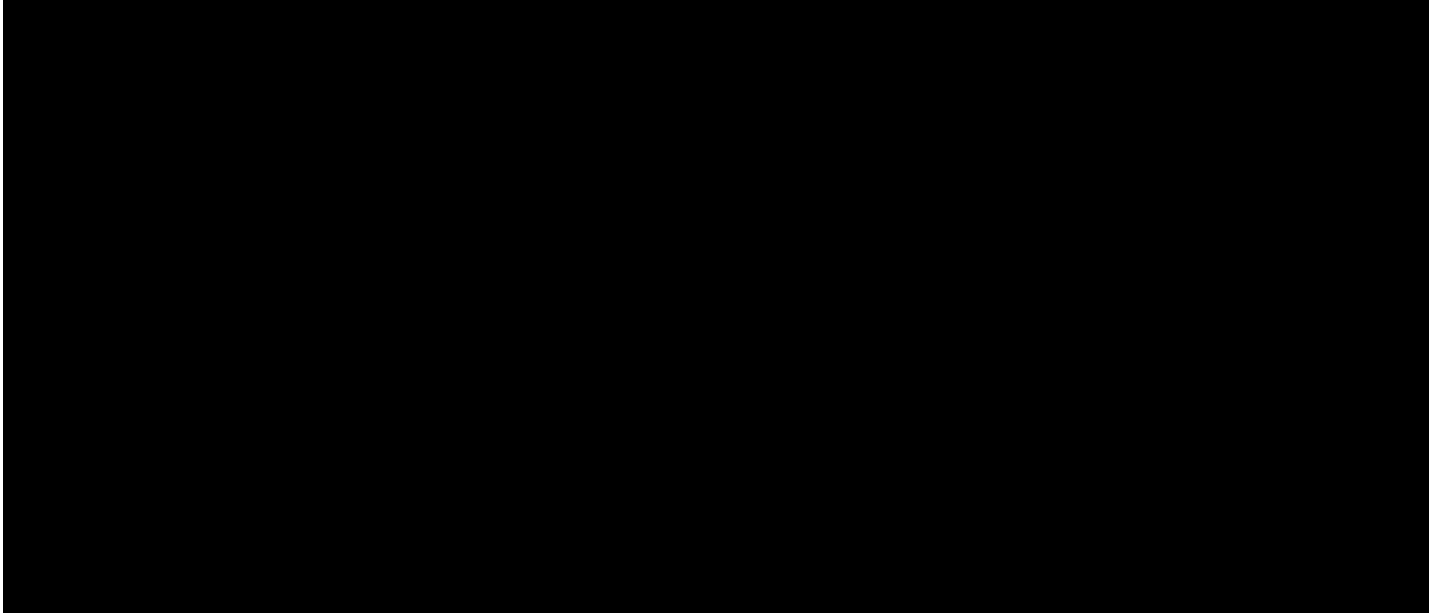
Funds describes how many participant (employer) funds were utilized during a particular time period. This information can be filtered by account group, authorizations, and/or payee. A line-item listing provides the name of the payee (worker), reference ID, time period, and amount utilized.

Figure 29b: Budget by Units

Units provides the number of service units utilized for a participant (employer) during a specified time period. This information can be filtered by account group, authorizations, and/or payee.

E.8. Payroll Processing

The State will benefit strategically from an incumbent vendor who has all the people, processes, and payroll systems in place to continue providing proven payroll services to existing program participants while collaborating with the State to onboard new waiver programs, as applicable. **On pages 151-165 we offer our approach to payroll processing which exceed the requirements outlined in this RFP,** including on page 154 the inclusion of a sample MOU with our banking institution. Our approach for processing payroll during a system outage is described beginning on page 164, while our approach for processing payroll following participant disenrollment and our approach to facilitating off cycle payments are captured on page 165.

Palco has demonstrated our expertise and capabilities to perform the primary function of a VF/EA FMS entity - to process payroll for self-direction program participants' employees in an accurate and timely manner while remaining in accordance with federal, state, and local tax and department of labor wage and hour laws.

This section details our solution for processing and distributing payroll for qualified workers and filing and paying related taxes and insurance. The payroll function begins with timesheet submission and processing tasks. We provide high-volume payrolls and remit a variety of related reports to our partners.

E.8.A. Payroll Processing Requirements

We easily adapt to changes in federal and state tax, labor, and program rules and requirements, including IRS changes in reporting, forms, and procedures; federal and state Department of Labor overtime and wage reporting changes; and state program policies and procedures. With each challenge that we have faced, we have provided quality FMS and related support at vast cost savings while honing our expertise in the provision of self-directed services.

Our expertise in the provision of VF/EA FMS has allowed us to scale our operations in self-directed service programs nationwide. We have extensive experience in providing services and support to over 10,000 Self-Directing Participants and 21,000 Caregivers. Currently, we provide these support services to multiple programs in eight states, delivering an array of services that includes the following:

- ✔ VF/EA FMS (e.g., payroll and tax filings, accounts payable, budget utilization).
- ✔ Participant/Representative (Employer) and Employee enrollment.
- ✔ Employer orientation and skills training.
- ✔ Medicaid billing and claims processing.
- ✔ Development of in-house self-direction software solutions, including online enrollment solution (Intake), electronic timesheet submission solution (Connect), and transparent web-based portal (Case Management Portal).
- ✔ Development of a program-specific website.
- ✔ Customer Support Center

❥ On-demand reporting.

With these experiences, Palco is in a unique position to provide services that aid individuals to live independent lives, where they are empowered to make their own choices about what is best for them.

Palco understands that the objective of this RFP is to contract with a qualified vendor to provide financial management, counseling, and payroll administration to eligible participants throughout the State who receive self-directed services. We offer enhanced opportunities for self-directing participants through our in-house software solutions developed specifically for self-direction programs. We provide the quality, efficiency, effectiveness, and the accountability DHS seeks from an FMS partner. Palco is a company that is capable of coordinating and managing FMS in a manner that is fiscally and programmatically effective and efficient for participants and the State as evidenced by our previous 22 years of service to DHS programs.

Palco shares DHS's vision of quality services for the participants served by the Arkansas self-direction program. That includes quality services and software solutions as well as scrutiny of all aspects of self-directed services to prevent participant abuse and the fraudulent use of state Medicaid funds. We will continue to present innovative methods for deterring participant abuse and fraud.

We take the fiscal responsibility we are tasked with seriously. Palco fully understands the scope of services to be provided, our responsibilities, and how to effectively manage the contract.

We currently comply with the FMS duties as outlined in Section 2.5.5 in the RFP by performing those tasks listed above as well as:

❥ Act as the employer agent to the Participant/Representative ("Employer") in accordance with Section 3504 of the Internal Revenue Service ("IRS") Code, IRS Revenue Procedure 70-6, IRS Proposed Notice 2003-70, and REG-137036-08, as applicable.

❥ Act as a neutral "bank" for participants' Medicaid funds.

❥ Provide payments to qualified self-directing Employees and vendors, as required by federal, state, and local tax, labor, and unemployment insurance laws, as applicable.

❥ Prepare and distribute payroll, including the management of federal and state income tax withholding and employment taxes.

❥ Verify the citizenship and alien status of prospective self-directing Employees as well as determine whether they meet the state requirements for the services they are providing.

❥ Track CEP/budget utilization and report on participant utilization and spending.

❥ Invoice processing and paying for approved self-directed goods and services in accordance with the participant's budget/cash expenditure plan; and

❥ Provide fiscal accounting and make spending reports available to Participants / Representatives (Employers), DHS program staff, and other stakeholders as required.

Palco is also committed to:

- Reducing the employer-related burden on individuals receiving self-directed services.
- Enhancing participant choice and control through the provision of appropriate fiscal, payroll, and supportive services.
- Monitoring the provision of self-directed services for compliance with federal, state, and local tax, and labor rules and requirements related to the employment of qualified workers and the engagement of vendors, and independent audits by conducting ongoing compliance reviews of relevant documentation.
- Providing initial orientation and skills training for participants/representatives serving as Employers; and
- Achieving cost savings and efficiency with respect to financial management services while enhancing Counseling support provided to program participants.

Palco also registers Employers with the State of Arkansas to acquire a state income tax registration number for income tax filing and payment purposes. **Palco attests that all required documentation pursuant to section E.8.A. will be maintained**, including at a minimum, documentation of the tax filings and payments in the Employers file.

Palco has a strong relationship with our financial institution selected by the Contractor that receives the Medicaid funds which are deposited into a non-interest-bearing account. We have an executed MOU in place that mirrors the example shown below in **Figure 30** on the next page. We will provide a new executed DHS-approved MOU within ninety (90) business days of the new contract term. Any changes to the MOU will be submitted to DHS program staff within twenty-four (24) hours.

"This program has allowed my caregiver to stay at home with me and still get paid. I am able to be taken care of by my loved one instead of having to go through an agency or go to a rehab facility. I am able to be comfortable with my caregiver and that makes my life so much better. If it was not for the Palco program, I would not be able to live as normal. I am appreciative we found this program and company."

-John R. from Arkansas (Used with permission)

Figure 30: Example MOU with Palco's Banking Institution

PALCO

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Little Rock, AR 72223
Toll Free 866.710.0456
Online: PalcoFirst.com

MEMORANDUM OF UNDERSTANDING

May 31, 2022

As a contractor of the State of Arkansas Department of Human Service this docu nt represents a Memorandum of Understanding between Palco, Inc. and this ba g i tution that the Beneficiary/Employer's budgeted Medicaid funds deposited into a non-in t-bearin ccount, does not belong to Palco, Inc. nor does it belong to this bank. I am declaring t th unds shall be established to hold reimbursements paid by DHS and to m e disbursements n the account solely for the Beneficiary/Employer budgeted Medica tasks. a contract acting under IRS regulations as a "Vendor Fiscal/Employer Agent", P o, In all se as th iduciary and trustee of these funds. This Memorandum of Unders ding's p ose is t fine ownership of this account for the State of Arkansas Department o umar rvices.

_____   _____
Palco, Inc.   Date

_____   _____
Bank Official – 1st Security nk   Date

State of
County f
This re d w know dge before me on this day _____ of _____, 20____

_____
Notary

My commission expires:

CMP CONNECT® SECURE WEB PORTAL

Connect® is Palco's external time entry system. Users enter their timesheets online via this portal. Connect is also linked to Palco's EVV vendor via an automated job system that allows EVV visits to populate in Connect. **Connect is only available to Participants/Representatives and their Employees. It is not available to anyone else, such as Palco Counselors, DHS program staff, or Palco staff.** However, users with access to our Case Management Portal (CMP) view externally entered timesheet data from the CMP.

The Palco secure web portal, Connect, for electronic submission by employers and their employees, is accessible and functional 24 hours a day, 7 days per week except for limited maintenance times. Connect is fully integrated with our financial management system, provides real-time timesheet/activity form status information, offers real-time validation of timesheets to check for errors, electronically notifies the user of errors, and allows for corrections and resubmissions.

Timesheets submitted online or via mobile device are automatically checked for errors and individual budget compliance issues upon submission. System edits are designed to prevent payment of incorrect, incomplete, and duplication. Errors messages are displayed on the screen to adjust incorrect or incomplete information. If a user tries to enter duplicative activity (same dates, types, and units of service), the system will not allow entry. Users are limited to being able to enter only services authorized. This helps prevent payroll and billing errors on the front-end.

We provide online tutorials, training materials for users, and customer support for providing real-time assistance to electronic users. Our software is embedded with a combination of controls that perform crosschecks and calculations to prevent over-billing. Some examples include a series of variance and exception reports, along with error message displays on timesheet and claim processing tabs in our system. These instant alerts to potential over-billing allow us to remedy the situation promptly. Palco's integrated solution for EVV utilizes a near real time, secure claim web service application programming interface (API) hosted by FDGS. The service, which has been in production for 5 years, is used to retrieve visit geolocation and services in near real time as check-ins and check-outs occur. The web service integration results in a streamlined claim lifecycle with improved monitoring and faster billing submissions that allow for a high-quality user experience and quality assurance.

Palco strives to make all its products as accessible as possible. Our products are accessible and operable on standard hardware operating systems and browsers, without installation needed by the user.

TIMESHEET SUBMISSION

Palco provides workers with timesheets, instructions, and a Timesheet Submission and Payday Schedule that complies with Arkansas Department of Labor and Licensing payday requirements for hourly employees. We accommodate the existing alternating payday schedules (by FIPS code or other measure) in order to avoid disruption to the current expectations of the population. This information and the process for preparing and submitting worker timesheets is covered in the employer packet and on our website.

Timesheets are developed to contain all relevant information, including the employer and employee names, case IDs, service dates, time in and time out for each shift, total hours worked, and signature lines. Timesheets are built to accommodate split shifts and varying service types.

Timesheets are collected and processed quickly. We know that individuals rely on this income to support their families, and we are committed to making this process smooth. Employers have several options for submitting worker timesheets, at the employer's convenience. Timesheet submission options include submitting them electronically, online via website or mobile device, and if needed by fax, email, or paper submission via regular mail. A process flow can be seen in **Figure 31.** Palco is proud to be the first FMS vendor to collaborate with DHS and successfully transition the self-direction program to a completely paperless timesheet submission process.

Figure 31: Timesheet Process Flow
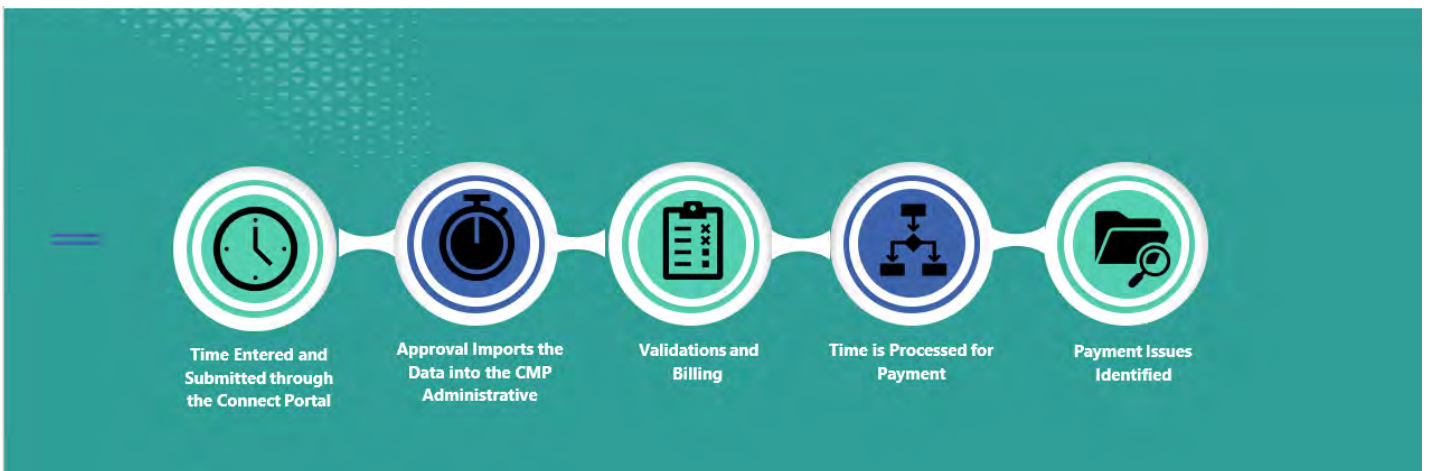
Connect is fully integrated with our financial management system, provides real-time timesheet status information, offers real-time validation of timesheets to check for errors, electronically notifies the user of errors, and allows correction and resubmission. The portal contains the following user-friendly and interactive features:

- Online time-entry, which is also supported on mobile device.
- Seamless system that integrates enrollment, timesheet, and payroll information.
- Cutting-edge, cloud-based technology.

- Accessible and functional 24 hours/7days a week.
- Capable of auto-scaling during periods of high-traffic.
- Enable users to view, update, and print real time and historical information including timesheets, payment requests, and mileage reimbursements for previous periods.
- Contains resources and reports for users, such as copies of documents, like paystubs and W-2s.

Timesheets submitted online or via mobile device are automatically checked for errors and individual budget compliance issues upon submission. System edits are designed to prevent entry of incorrect, incomplete, and duplicative timesheets. Errors messages are displayed on the screen to correct incorrect or incomplete information. If a user tries to enter a duplicative timesheet (same dates, types, and units of service), the system will not allow entry. Users are limited to being able to enter only services authorized on the Service Authorization. This helps prevent payroll and billing errors on the front-end, as opposed to after payroll.

Additionally, any times that are entered that appear to be duplicative or overlapping with times already entered into the system will be rejected. For instance, a user would be notified if they tried to enter a shift from 3:01 p.m. to 5:01 p.m. if the system recognized that time was already entered for the same day and service type during any times in this range, no matter when the shift begins or ends.

We review all pending timesheets each time payroll processing is performed. Through this system, we review timesheets and ensure that pending timesheets are ultimately resolved quickly, and we prevent payment of incorrect timesheets for most issues.[2]

Timesheets are initiated by either the employer or the employee. As seen in **Figures 32 and 33**, the initial entry selection requires the following information to be input for a complete entry:

- Dates of service.
- Type of service delivered.
- Shift start time.
- Shift end time.
- Attestation that the time entered is accurate.

---

[2] If is not prevented at the timesheet entry stage, exception reports and quality checks done prior to producing payroll will catch timesheets that should not be paid due to various issues.

Figure 32: Mobile Time Entry Screen Shot

Figure 33: Electronic Timesheet Detail
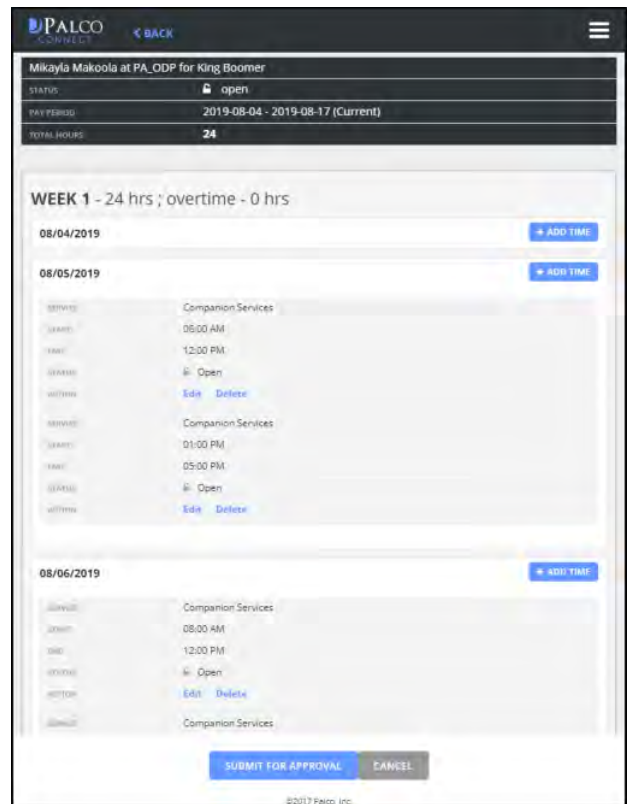
Once submitted, a notification is sent to the other party (e.g., if the worker entered the time initially, the employer would receive the notification, and vice versa) that time is ready for review. Here, the user can take a variety of actions. They can approve it, which sends it on to Palco for processing. They may choose to reject the time, which sends a notification to the initiator of the time submission that their time was rejected. Or they may correct the time and resubmit it – in this case, the initiator must log in again to approve the amended time. We provide online tutorials, training materials for users, and call center support for providing real-time assistance to electronic timesheet users.

If the timesheet contains errors, a customer support agent personally calls the individual and instructs them on correcting and resubmitting their timesheet. Connect tracks individuals who chronically make claims that exceed spending plan amounts and will report them to DHS program staff. This is done to allow time to correct issues prior to the next payday.

Our software is embedded with a combination of controls that perform crosschecks and calculations to prevent over-billing. Some examples include a series of variance and exception reports, along with

error message displays on timesheet and claim processing tabs in our system. These instant alerts to potential over-billing allow us to remedy the situation promptly.[3]

PAYROLL PROCESSING

A primary function of a VF/EA FMS entity is to process payroll for program participants' SSP/DCWs in an accurate and timely manner and in accordance with federal, state, and local tax and department of labor wage and hour laws. The payroll function begins with Electronic Visit Verification (EVV), timesheet submission and processing tasks.

Palco has developed and provides self-directing Employees with instructions for using EVV, how to manually enter time, and instructions for timesheet submissions in accordance with the Payday Schedule. This information and process for preparing and submitting Employee time is covered in Participant/Representative orientation and skills training described in Section E.4.B.

Palco's approach to EVV includes working with the state's chosen EVV solution, AuthentiCare, which is fully integrated with the Palco Connect portal ensuring the two systems (AuthentiCare and Connect) work seamlessly so there is never confusion on where actions need to take place.

Once information related to timesheets is in our system and verified via EVV, the payroll process is initiated.

Timesheet data are compared to budgets, checking for errors and individual budget compliance issues upon submission. Exception Reports itemize discrepancies, such as timesheet reporting for individuals who have an inactive status or timesheet hours that exceed budget-authorized hours. Palco management staff, composed mostly of CPAs, review these reports carefully to determine the appropriate action to be taken for each instance. All issues are communicated to the Participant/Representative for revision, resubmission, and prompt payment of Employees.

Our system has proven to be effective in tracking and responding to occurrences of payment request over-billing and payment requests that cannot be paid due to missing or erroneous information. All issues are communicated to the employer with sufficient time for revision, resubmission, and prompt payment.

Withholding information from the IRS Form W-4 is used to calculate federal and state income tax withholding. Worker residency, relationship with the employer, and live-in status collected during enrollment provides tax exemption and overtime calculation information, in accordance with IRS rules regarding domestic employment, the Department of Labor Home Care Rule, and state employment-related rules. Workers are paid according to the rate set by their employer (which may differ by worker) in compliance with federal and state tax and Department of Labor wage and hour rules for regular and overtime pay.

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[3] Internal controls are necessary to ensure fiscal responsibility and quality control. Our CPAs are trained in implementing internal controls on a firm-wide basis.

Voluntary wage deductions are captured at the time of the worker's enrollment, and by request. Our system also captures FIPS codes to ensure taxes are withheld properly.

Palco's payroll software automatically calculates the total payments for worker timesheets, including federal and state withholding and employment-related taxes. Medicare and Social Security tax (FICA), federal income tax (FIT), and state income tax (SIT) are withheld from workers' paychecks each time a payroll is generated. SIT is calculated at the applicable Arkansas income tax rate.

Some workers who provide domestic services may be exempt from certain taxes depending on their familial relationship with the employer (see IRS Publication 15 and IRS Revenue Procedure 2013-39 for more details). We collect relationship information during the enrollment process so that we withhold taxes properly.

In addition to FICA and federal and state income tax withholdings, garnishments, levies, liens, and voluntary deductions are also withheld for each payroll generated, as applicable.[4] **Palco has the capacity to calculate deductions related to Difficulty of Care payments per IRS Notice 2014-7, should DHS choose to accommodate this offering.**

Palco processes all payments for judgments, garnishments, tax levies, or other related holds on qualified worker pay as required by federal or state governments immediately after payroll is generated. Palco tracks balances due on garnishments and voluntary deductions. When a garnishment is paid in full or Palco is notified by a third party to terminate a deduction, staff disable the deduction in our accounting information system. All documentation of authorizations to deduct and their terminations are kept in the worker's case file.

Each disbursement is coded to an expense account. Payments are offset against budgeted amounts. Remaining balances, calculated as the difference between budget limits and period spending, are displayed on each individual's account in real time for viewing in the Palco Connect system by Participants/Representatives and in the Palco Case Management Portal (CMP) for our internal support staff and DHS program staff.

We are proud to be the first FMS vendor to transition the self-direction Employee population to a totally paperless payment method, with all payments being made via direct deposit. Immediately after processing, direct deposits are sent to our financial institution. Palco has a documented system, policies and procedures, and internal controls to ensure that employee pay rates and billable rates are accurate, as established by DHS, in accordance with hourly pay and tax rates. We have protocols for Quality Assurance and payroll data testing of all impending pay rate changes.

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4 Garnishment information and documentation, such as court orders or withholding notices, are retained in each worker's case file. When applicable, the advanced earned income credit is considered.

All payroll and payment methodologies identified above are documented in Palco's Arkansas Operational Policy and Procedure Manual and are monitored through a variety of internal controls. In our many years serving as a VF/EA FMS entity, Palco has never missed nor delayed a payroll.

Direct deposit paystubs contain information needed by workers to understand their payment, including net and gross pay, withholdings, overtime hours/pay earned (if applicable), voluntary deductions, garnishments, and other payment related information. These paystubs are viewed by Participants/Representatives and their Employees in the Palco Connect portal. Palco staff and DHS program staff also view this information in our Case Management Portal (CMP).

See an example of an EFT stub to a vendor in **Figure 34** below.

Figure 34: Example EFT Stub

ISSUING PAYROLL
Palco processes payments to employees biweekly via direct deposit.

For payrolls that fall on a holiday, Palco issues payments a day early, when possible. We also run off-cycle payrolls for various reasons, including worker hardship or DHS or Palco error. In addition, we provide various reports to Palco Counselors and DHS each time payroll is run. Such reports list denied timesheets and payroll information, such as gross and net pay and withholding information. If a timesheet is submitted after the payroll deadline, individuals are not required to wait until the following pay period to receive funds; "off-cycle" pay is issued prior to the next payday. This helps

mitigate financial harm to Arkansas families and keeps individuals in compliance with Department of Labor requirements.

Palco processes thousands of direct deposit payments concurrently with the capability to expand this number without limit.

In cases where payroll checks are lost, stolen, or improperly disbursed, Palco issues a stop payment within 24 hours. Stop payments are typically effective immediately; in a few cases, it takes up to 24 hours for Palco's banking institution to stop payment on a payroll check. In all cases, payroll checks are reissued on the next off cycle payroll prior to the next payday after receiving confirmation that the bank has effectively issued a stop payment. A log of these actions is maintained in Palco's general ledger, and appropriate documentation is retained in Palco's payroll files.

In the rare case that direct deposits that are issued improperly, Palco will reverse the funds on the account when possible. If not possible, a payment plan is established with the worker.

ISSUING PAYMENTS FOR GOODS AND SERVICES

Palco makes payment for goods and services based on invoices from a retailer or from receipts provided by the employer. Purchases authorized by the CEP of less than $50 will be reimbursed to the participant based on receipts provided by the employer. Receipts are stored in the participant's electronic file. Single purchases above $50 must be authorized by a designee from DHS. Supporting documentation required for these purchases include:

- ✔ The name and address of the service provider.
- ✔ A description of the purchase.
- ✔ Scanned documents from DHS program staff supporting authorization from DHS.
- ✔ A receipt, invoice, or purchase order and total payment amount.
- ✔ The Medicaid ICN linked to the prior authorization.

Palco reviews receipts and other documentation to ensure that they are consistent with the CEP. Payments are made to Beneficiaries according to the biweekly payroll schedule. Palco maintain all supporting documentation relative to the payment in the participant's electronic file. Payments are made to Beneficiaries only if all supporting documents and authorizations have been received. Payments are made to Participants by EFT.

END OF YEAR TAX AND OTHER ACTIVITIES

Prior to mailing out tax information in January of each year, we verify and update each Participant/Representative (Employer) and their Employees address and phone number. We also verify that each Employee Social Security Number matches the name and date of birth information from Social Security Administration's Business Services Online.

At year-end, the following activities take place:

- ✔ IRS Forms W-2, *Wage and Tax Statement*, and W-3, *Transmittal of Wage and Tax Statements*, and their Arkansas counterparts are processed, filed, and distributed for workers who have gross wages exceeding the current threshold amount for domestic employees. W-2s are reconciled to the calendar year's total gross payroll.

- ✔ Employees receive a copy of their W-2 or a refund of employment taxes if they did not meet the annual wage threshold.

- ✔ The employer share of over-collected taxes, including FICA, FUTA, and SUTA, for Participant/Representative (Employer) is returned to DHS and for self-directing Employees is handled according to IRS and DHS directives.

Our year-end procedures also include processing any returned Employee payroll checks according to Arkansas Unclaimed Property Laws.

All documentation related to tax refunds and W-2s are maintained in the Participant/Representative or their Employee's file. We maintain copies of W-3 information in our Palco files and Arkansas Unclaimed Property-related documentation in the Employee's file.

BANKING AND FINANCIAL CONTROLS

Palco has established and maintained a separate accounting and information system for receiving and disbursing funds, and for tracking transactions and budgets. We have established separate bank accounts for our administrative fees and for the sole purpose of receiving payments from DHS for participant funds. No funds in either account will be comingled with any other funds, and funds will be used only as directed under the RFP.

Our banking and accounting controls include the following, approved through a Board resolution:

- ✔ The owners of Palco are the only allowed signees on our bank account. All checks must be signed by an owner of the company, who are both licensed **Certified Public Accountants** bound by codes of professional ethics related to financial integrity.

- ✔ Our financial institution has an exclusive list of **pre-approved entities** that can withdraw money or debit funds from our accounts. Such entities include the IRS for tax payments, the program, and state tax authorities. Anyone not on this list cannot debit funds. Funds withdrawn must be approved by the Board of Directors and may only be for program taxes, insurance, and bank charges absorbed by Palco.

- ✔ Annually, we execute a notarized **Memorandum of Understanding** (MOU) see **Figure 30** on page 135 with our financial institution. This MOU establishes a clear understanding that the account's funds belong solely to the Medicaid beneficiaries, and creditors are not allowed to encumber or acquire funds from this account.

- ✔ **Randomized time-sensitive passcodes** are generated by our financial institution each time we send a direct deposit file to prevent unauthorized access to funds.

- ✔ Proper **segregation of duties** is engaged through the payroll process with operations separated from reconciliations, for example.

- ✔ Palco follows **Generally Accepted Accounting Principles** (GAAP) in the use of a general ledger and subsidiary accounts for handling of participant funds.

- ✔ **Reconciliations** are performed on a continual basis to ensure quality. It includes financial account balancing, comparing data to ensure accuracy and completeness of transactions, and investigating discrepancies.

- ✔ Palco prepares and submits a **bank account report**, including a monthly reporting of bank account activity, a summary of the month's bank activity, reconciliation of the bank balance to the general ledger, and reconciliation of any amounts advanced to Palco.

E.8.B. Payroll Processing during System Outage

We have integrated our FMS and Case Management software to store and retrieve data from AuthentiCare, the state's chosen EVV solution. Working closely with FDGS, we have built an application programming interface (API) to provide a consistent, reliable, and secure data exchange mechanism so that visit data or shifts captured in AuthentiCare are pulled into Palco's electronic timesheet software (Connect) for payroll processing. In Palco Connect, Participants/Representatives and their self-directing Employees view their EVV shifts as an electronic timesheet, allowing them to review their shifts for accuracy before submitting for payment. Only shifts with all six CMS-required data elements are imported into the Palco Connect system.

- ✔ If an Employee makes a mistake in AuthentiCare, they use Palco Connect to make a correction to their timesheet before submitting to Palco for payment.
- ✔ If an Employee forgets to capture their shift in AuthentiCare, they use Palco Connect to manually enter their shift and note the reason why they are having to do a manual entry.

Likewise, if the state's chosen EVV solution (AuthentiCare) is experiencing an outage the Palco Connect system has the capability to:
- ✔ Capture name and type of services allowable under program rules.
- ✔ Recognize the type of provider able to perform those services per program rules.
- ✔ Identify specific providers that can receive payments.
- ✔ Identify services that require EVV.
- ✔ Capture information about service authorizations (amount allocated and current status).

In the event of a regional GCP outage, the entire application ecosystem is scripted and is manually redeployed to an unaffected region with minimal downtime. Palco has chosen this design strategy so that their application uptime will target 24-hour availability, 7 days a week. Our cloud-based software

system is built so that any system maintenance there would have little to no impact on our GCP uptime.[5]

Our effective Disaster Recovery Plan outlines processes for generating payroll on the due date, even during times of inclement weather and unanticipated power or server failure. Should an issue arise, it will be communicated to DHS within four (4) hours.

E.8.C. Approving Time (participant disenrollment)

In some instances, Palco may need to adjust either timesheets or employee payments. Adjustments made to payments happen when Palco pays an employee that claims all hours through an unreported hospital stay. When Palco receives the weekly hospitalization reports, Palco reviews the report for unreported hospital stays, if an overpayment has been determined on an active participant, a reduction in hours is made to the following pay period to cover the over-payment. In instances that the participant is disenrolled, Palco will notified DHS program staff of overpayment. Timesheets are also adjusted based on reported hospital stays and eligible days of service. When a hospital stay is reported, the enrollment specialist removes the days that are not eligible for pay. Hours will be adjusted down when the timesheet is received to prevent overpayment.

Timesheets are also adjusted if there is a change in the participant's active status. When an active or disenrolled effective date falls in the middle of the service period, funding for days that are not eligible for pay is refunded back to Medicaid. Days prior to an effective start date are not eligible for pay, and days after a disenrolled date are not eligible for pay.

E.8.D. Facilitating Off-Cycle Payments

Off Cycle Payroll Runs (OCPR) are payrolls that are processed outside of the normally published payroll schedule. Currently, we process an off-cycle payroll every other week with payroll happening on Wednesday and payments occurring on Thursday during the week between regularly scheduled program pay dates. This process allows for workers to be paid for late time and corrected time quicker than waiting for the next regularly scheduled payroll.

During the aforementioned EVV implementation when Palco partnered with DHS and FDGS in spring 2021, Palco processed payroll 1-2 times per week during a 6–8 week period to ensure money made it into the hands of stakeholders as quickly as possible. This commitment to the program and people served by this program is what makes Palco the best continued partner in the industry.

The payroll schedule for the *IndependentChoices* program is located here:
https://palcofirst.com/wp-content/uploads/2021/12/ARIC_Payroll_Schedule_2022.pdf

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[5] Any internal system maintenance that might require downtime would be scheduled on periods of low traffic, such as the weekend or a holiday. Users are notified through in-app message one-week in advance of scheduled maintenance detailing the reason, projected start time and duration.

E.9. Customer Support

Palco will continue to exceed the requirements outlined in Section 2.5.14 in the Scope of Work by offering all the necessary Customer Support services to provide support to program participants. We offer our approach to maintaining quality interactions between our Customer Support staff and program stakeholders on pages 170-172, with the preceding pages describing our Customer Support Center capabilities and current staffing model. Our approach to Customer Support staff training can be found beginning on page 172, while our approach to tracking and auditing calls received can be found on page 174. Our approach for tracking and responding to complaints and grievances is also outlined beginning on page 174 and our strategy for tracking call center metrics is found on pages 175-180.

To maintain a person-centered approach, our Customer Support Center (call center) is staffed with live representatives, who have the skills needed to address concerns and provide a range of solutions or additional training. Technical assistance is made via phone, voicemail, email, and chat features on social media channels. Palco staff has developed trusting relationships with many Participants, Designated Representatives, Caregivers, and Program Staff, fostered over many years of resolution, and treating callers with respect and courtesy that reflect the principles of the Department.

Palco has an established Customer Support Center that effectively serves the diverse population of Participants/Representatives and their Employees, in an efficient manner. We ensure our customer support policies and procedures reflect the principles of self-direction and the Department.

We operate a TTY/TDD line and provide access to written and spoken translation and interpreter services at no cost to the caller. Our Customer Support Center has Spanish-speakers onsite and utilizes a third-party service for all other languages. This service currently provides access to nearly 300 languages. Translation services are engaged through a warm transfer by calling Palco. Once we identify translation services are needed, we patch in the translator and remain on the line during the entire call. This keeps the caller from having to make an additional call to access this service.

Information is available in alternate print formats (e.g., large print and Braille) and in languages other than English. We also provide interpreter services (i.e., American Sign, and services for persons with Limited English Proficiency), as needed.

We provide a greeting message and educational or information messages approved by the Department while callers are on hold. We leverage this feature when rolling out new initiatives, system features, or DHS policies to serve as a reminder to the caller.

We maintain an Arkansas program-specific website with helpful information for program stakeholders, as well as pertinent forms. This information is available 24/7 on our 508 compliant palcofirst.com site. Our comprehensive customer support system includes the following:

- Live staffing of a toll-free telephone system from 8:00 a.m. to 5:00 p.m. CST/CDT, Monday through Friday, except on state and federal holidays. Ninety-five percent (95%) of calls will be live answered.
- 24-hour dedicated toll-free phone number and toll-free fax machines with expandable capacity.
- Operational TTY/TDD line, at no cost to the caller.
- Access to written and spoken translation and interpreter services at no charge to the caller. Our call center has Spanish-speakers onsite and utilizes a third-party service for all other languages.
- State-of-the-art equipment to prevent bottlenecks in daily operations.
- 24-hour operational voice messaging system.
- Mandatory reporting of fraud and abuse with a system and process for reporting critical incidents.
- IT infrastructure complete with a firewall appliance that keeps internal voice and data segregated from external traffic through a DMZ.
- Option for transfer to EVV vendor on ACD menu, as well as ability for live agents to transfer callers to partner EVV vendor.

Palco's Director of Customer Support currently has a staff of 13 Customer Service Representatives, one (1) Team Lead and one (1) Supervisor who perform a variety of activities, such as receiving inbound calls, placing outbound calls, training, assistance with self-directed program enrollment and other support activities. Our Director of Customer Support serves a core role in ensuring customer service needs are met.

STAFFING

Palco's staff is what sets us apart from our competitors. We take the time to recruit the best candidates for each position and invest resources in comprehensive training to provide the best outcomes for our clients.

We foster relationships with each of our partners and believe this is key to a program's success. We do this by always being accessible and engaging with our partners. Palco will designate a subject matter expert, known as an Account Manager, to serve as a single point of contact for state personnel and a liaison for technical assistance for Department staff. This individual is dedicated solely to this project, answering any questions, and addressing any issues in a timely manner. This contact is

available daily via email or phone, always giving the Department a direct line to Palco. The Account Manage is available to the Customer Support Team as well.

All Palco staff is required to undergo criminal background checks, Medicaid exclusion checks, and other abuse registry check upon hire. We conduct E-verify and other checks to ensure that all staff is legally authorized to render services under applicable federal and state law and/or regulations.

We have the ability to bring in staff from other areas of the call center as needed. We ensure that all staff is cross-trained and have the ability to access all Arkansas-specific materials as needed to answer calls. This strategy enables us to employ skilled staff, who understand our expectations, as opposed to temporary staff, who may be otherwise disengaged from our mission. We will submit our staffing plan changes to DPSQA annually and as necessary. Customer Support Center organizational chart **Figure 35.**

Figure 35: Customer Support Organizational Chart
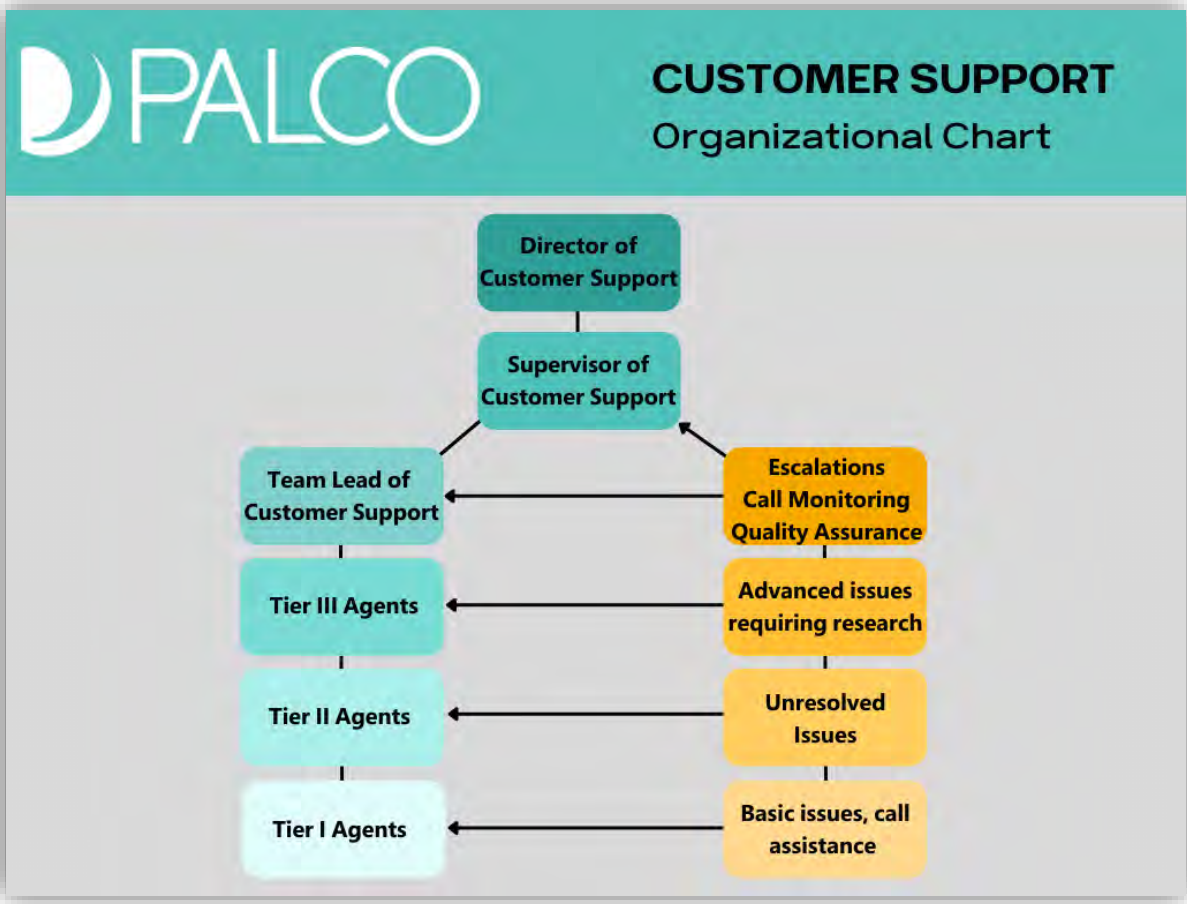
DIRECTOR OF CUSTOMER SUPPORT

The Director of Customer Support is responsible for the overall operations of the call center and has over 30 years of experience providing customer support services. The Director provides strong leadership to and oversees and determines key strategic direction and objectives of the Customer

Support team, while driving necessary changes for the improvement of operating and organizational efficiency. The Director of Customer Support reports directly to the Chief Operating Officer.

CUSTOMER SUPPORT SUPERVISOR

The Customer Support Supervisor is responsible for the day-to-day operations of the call center. The Customer Support Supervisor plans, directs, manages, and evaluates subordinate's performance, while developing and promoting productivity standards ensuring customers receive prompt high level of professional and courteous service. It is essential for the supervisor to establish and maintain positive relationships with customers through effective communication and conflict resolution methods. The Customer Support Supervisor is responsible for establishing cooperative interdepartmental relations and coordinates customer support activities with other internal functions. The Customer Support Supervisor reports directly to the Director of Customer Support.

REMOTE CUSTOMER SERVICE REPRESENTATIVE (CSR I/II/III)

A Home-Based Customer Service Representative is the primary customer facing Palco employee who provides assistance and support for individuals self-directing Medicaid services in the home as well as the Employees serving those self-direction participants. The Customer Service Representative is knowledgeable of specific rules and qualifications of the programs Palco supports. Using their knowledge of products or services as well as great customer service skills, the Representative promptly and accurately address issues, provides support and information to ensure customer satisfaction. They also maintain very good knowledge of company systems and sensitive information/PHI handling procedures. Customer Service Representatives are responsible for handling 20 – 40 inbound and outbound calls, with the ability to determine needs and provide a one call resolution. This position requires the ability to work Monday – Friday from 7:00 am – 6:30 pm CST. The Customer Support Representative reports to the Customer Support Supervisor.

TEAM LEAD

This is the advanced grade in the Customer Support Representative staffing model and requires vast customer support experience. Incumbents of the grade are typically assigned the more complex and difficult customer support issues, are expected to work independently and to assume higher responsibility for researching customer issues. Employees in this grade are also expected to provide instruction/guidance/training to Customer Support Representative I & IIs.

CSR III

This Senior Customer Support Representative position provides critical service to key business associates, providing the utmost customer-focused assistance, and is a vital partner on our team. Individuals in this position deliver specific delegated tasks assigned by a Customer Support Supervisor. Incumbents of the grade are typically assigned the more complex and difficult customer support issues, are expected to work independently and to assume higher responsibility for researching customer issues. Employees in this grade are also expected to provide instruction, guidance, and training to Customer Service Representative I & IIs. A senior representative performs research to

respond to inquiries and interprets policy provisions to determine the most effective response, as well as provide Tier II Support to Third Party Customers as defined in the Contract.

CSR II

This grade is normally filled by advancement from the Customer Service Representative I grade or when filled by external hires, requires prior experience. A Customer Service Representative II works under general supervision and within framework of established procedures, is expected to perform a wide variety of customer support activities with limited instruction or assistance. Individuals should exhibit adequate performance at this level, requiring a knowledge of departmental procedures and precedents, and the ability to choose among alternatives in resolving customer issues. They provide customer service training to new employees and have the ability to clearly explain enrollment and payroll processing practices to customers. A Customer Service Representative II is expected to work productively even in the absence of a supervisor and analyze customer information to determine needs while working towards a one-call resolution.

CSR I

This is the entry level grade in the Customer Support staffing model. This entry-level role provides a strong foothold into our organization. Incumbents of this grade perform a range of customer support work that does not require prior experience. Generally, additional assistance is required in performing tasks. Individuals in this grade are expected to provide a basic level of support commensurate with their knowledge, skills, and abilities. Customer Service Representative I's are normally considered to be in training and as assigned responsibilities and breadth of knowledge increase with experience, may be reasonable to expect promotion to next higher grade.

E.9.A Customer Service Quality Assurance Methods

Our staff have developed trusting relationships with many participants, representatives, support workers, and case managers, fostered over many years of resolution and treating callers with respect and courtesy. Direct client interaction is managed by a quality assurance program that help us evaluate resources, develop new and better practices, and provide ongoing training. Such QA measures include:

- Satisfaction surveys.
- Call monitoring of inbound and outbound calls.
- Call arrival patterns and trend analysis (such as average speed of answer).
- Management reviews of contact note logs that provide historical narrative of events that have transpired on a particular account.

Palco uses a cloud-based interactive voice recognition software called GoTo for all call center operations. This system was chosen since it is flexible and scalable to meet future demands and is easily integrated with a variety of systems. This IVR enables 24/7 caller access to timesheet and payroll information; uses call recognition tools for identification, queue routing and call prioritization, assignment, and escalation; enables automated outbound calls; has digital Voice Recording

Technology and live call and computer screen monitoring for Quality Assurance; collects collect customer service data at each decision point; has a comprehensive queue management solution; and produces reports for management.

Additionally, the GoTo system offers an intuitive, easy-to-use desktop tool to improve customer care representative performance, as well as guide agents in their call workflow. It also allows for home-based agents, which are utilized during periods of disaster.

Our CRM allows call tracking and reporting including an electronic record to generate a synopsis of all calls and to provide a complete audit trail of communication to the call center from all parties.

Our Customer Support Quality Assurance program was developed to ensure that our call center staff are meeting all contract requirements and Palco expectations. We record all incoming calls and review a 10-15% sample of these calls monthly for quality. These call recordings and QA reports will be provided to DHS program staff as requested. We also conduct weekly live call monitoring of our call center staff.

This includes utilizing a standardized form to ensure that agents engage the proper soft skills (greeting, closing, hold-placement), are knowledgeable and courteous, resolve the issue at hand, follow HIPAA guidelines, and meet company expectations. Each agent is given a QA score based on these activities every month, and the QA score is reviewed alongside the agent. Recorded calls are stored for 30 days.

Our Client Relations Management (CRM) tool allows call tracking and reporting including an electronic record to generate a synopsis of all calls and to provide a complete audit trail of communication to the Customer Support Center from all parties. Additionally, we have the capability to structure the IVR in a manner that allows calls to be monitored by a third party, for the purpose of evaluating call center performance.

Our internal reports used for contract management include all measures of contract performance, including the following:

- 100% of all inbound and outbound calls are documented and maintained in our CRM.
- Fully operational and accessible agents during the timeframe required by the contract.
- 95% of monthly inbound calls are answered within 3 rings or 15 seconds.
- 100% of voicemails, callback requests, and inquiries are returned within one (1) business day.
- Abandoned calls do not include dropped calls.
- Monthly abandoned calls represent 5% or less of incoming calls, regardless of queue placement.
- Call queue wait time does not exceed five (5) minutes, regardless of queue placement.

We will provide detailed weekly, monthly, quarterly, and annual cumulative data to DPSQA, as requested. Data will reflect trends using tables, charts, or graphs. Our typical suite of reports includes the following data points:

- Number of incoming calls
- Number of outbound calls
- Number and percentage of calls received by subject
- Number of calls routed to voice mail
- Return call requests
- Percentage of calls returned within one (1) Business Day
- Number and percentage of answered calls
- Average speed to answer
- Average and maximum talk time
- Number of outbound calls (voice and IVR automated)
- Number and percentage of calls abandoned, average time to abandon, maximum abandonment times
- Number of calls in the queue, average queue wait time, maximum queue wait time
- Number and percentage of first call resolutions
- Number and percentage of escalated calls beyond the customer service representative
- Number of individuals requesting specialized assistance

We will continue to provide ad hoc reports, as requested. **Both the CRM and GoTo are integrated, giving us the ability to retrieve reports and call metrics on short notice**. We report all critical system outages or incidents to DHS program staff immediately, along with additional information about the source of the issue, proposed resolution, and resolution timeline.

For any deficiencies in our services, we develop a corrective action plan within ten (10) business days that includes the following:

- Description of the findings.
- Specific steps to correct the situation.
- Name(s) and title(s) of responsible staff person(s).
- Timetable for performance of the corrective action steps.
- Monitoring that will be performed to ensure that corrective action steps were implemented.
- Signature of our project manager or a senior executive.

E.9.B. Customer Service Staff Training

Providing cultural and linguistically competent customer support is an integral component of the philosophy of self-direction and the provision of participant-directed services. Palco invests heavily in

providing diverse populations of participants of all ages with disabilities and chronic conditions, Employers, Caregivers, and others a variety of options when seeking help or to gain more information.

We access key resources related to the provision of cultural and linguistically competent customer services. One resource is the National Center for Cultural Competence (NCCC) at Georgetown University (https://nccc.georgetown.edu). The NCCC provides national leadership and contributes to the body of knowledge on cultural and linguistic competency within systems and organizations. With a major emphasis on translating evidence into policy and practice, NCCC provides a list of evidence-based promising policies, structures and practices that exemplify cultural and linguistic competence in health care and mental health programs. They also provide materials they have developed including policy briefs, checklists, guides, articles, and multimedia products.

Palco also accesses key resources regarding promising practices related to the provision of self-directed services, Fiscal Intermediary, and Information and Assistance supports as a Financial Management Services member of the Applied Self Direction, the Technical Assistance, Training, and Membership arm of the National Resource Center for Participant-Directed Services (NRCPDS). As a member, Palco receives current information on the provision of self-directed services and support (FMS and I&A) through Applied Self Direction's website and by attending conferences and webinars the organization hosts.

Palco's professional Customer Support team maintains a high level of performance and creates a great customer service experience through effective customer service training. We know that delivering positive experiences matter. Onboarding and training of staff follows a vetted training schedule and curriculum checklist to ensure every employee is educated on key concepts and program specifics necessary to the success of their position. Training includes but is not limited to:

- ✔ Product and Service Knowledge
  - o Understanding the Self-Directed Person Center model
  - o Program specific information included
- ✔ Palco's tools and how they integrate
  - o Palco's Case Management Portal (CMP), Enrollment (Intake), Timesheets (Connect), CRM tool
- ✔ Communication Skills
- ✔ Soft skills
- ✔ Organization and time management

Staff are also trained on DHS confidentiality policies and procedures, including HIPAA requirements, as well as DHS and program mandatory reporting requirements. We have a system and process in place for reporting fraud, abuse, and critical incidents.

E.9.C. Receiving, Returning, Tracking and Auditing Calls

We track all calls received and our response through an automated system that combines metrics from GoTo and Microsoft Dynamics CRM. track and audit calls received for quality assurance purposes. These tools maintain all inbound and outbound calls, requests, and complaint logs to ensure proper tracking and timely resolution of questions, requests for assistance, and complaints. **Each month we provide DHS program staff with a report on call center metrics.**

DHS should expect the following from Palco's Customer Support Center:

- Live staffing of a toll-free telephone system from 8:00 a.m. to 5:00 p.m. CST/CDT, Monday through Friday, except on state and federal holidays. Ninety-five percent (95%) of calls will be live answered.
- Automated call distributor system (ACD) to manage and assign incoming calls to available staff in an efficient manner.
- IVR-automated response to caller inquiries and timesheet and payroll inquiries 24 hours per day, 7 days a week.
- 24-hour operational voice messaging system.
- Voicemail box activated for after hours and during peak hours for callers who would prefer to leave a message. The voicemail is integrated with our ACD system. The voicemail has sufficient capacity to allow callers to leave a detailed message, have an outgoing message recorded in both English and Spanish, and provide prompts to remind callers to leave their name, telephone number, identification number, and the best time to return their call.
- 24-hour operational voice messaging system.
- 24-hour web-based information regarding FMS services.
- Secure email and fax capacity.
- Continual monitoring of secure emails, faxes, and phone calls.

Our Client Relations Management (CRM) tool allows call tracking and reporting including an electronic record to generate a synopsis of all calls and to provide a complete audit trail of communication to the Customer Support Center from all parties. Additionally, we have dedicated email boxes for customer support and enrollment to allow for proper tracking and resolution of email communication.

E.9.D. Complaints and Grievances

Palco tracks all calls received, including complaints, using the tools described in the previous section. We respond to complaints from Participants/Representatives and their self-directing Employees within one (1) business day and make every effort to resolve complaints/grievances within five (5) business days of receipt. We track all activities related to complaints and resolve VF/EA FMS related complaints and grievances. We provide monthly reports to DHS program staff outlining the complaints received and the resolutions, highlighting any themes presented and proposing strategies for addressing them, as appropriate, in the future.

Palco welcomes expanding an effective tool for conflict resolution including an advisory/grievance committee that engages stakeholders either in person or teleconference on the basis prescribed by DHS program staff. A responsive FMS demonstrates its commitment to transparency and quality through the following mechanisms:

- Stakeholder engagement practices, such as a task force of Participants, Employers, Caregivers, and other users of the FMS to address quality concerns.
- Having a team on the ground in Arkansas to provide technical assistance.
- Providing live call center representatives.
- Establishing accessible channels for participants and their circle of support to communicate suggestions to the FMS and methods for Palco to provide feedback to stakeholders.

Palco takes every measure to resolve internal grievances before involving DHS program staff. Calls are routed in order from Tier 1, Tier 2, Team Lead, and then Director of Customer Support, see **Figure 36**. The Director of Customer Support will notify the Account Manager of all calls that warrant the Director's level of escalation. When necessary, conference calls are coordinated between the Program Manager, the caller, Customer Support Center personnel, and others.

Figure 36: Grievance Support Triangle

E.9.E. Call Receiving, Responding and Tracking Statistics

We are proud of our ability to meet or exceed industry standards and as the incumbent, Palco believes that it offers DHS the best quality and value in every area including our customer support capabilities.

Our Client Relations Management (CRM) tool allows call tracking and reporting including an electronic record to generate a synopsis of all calls and to provide a complete audit trail of communication to the Customer Support Center from all parties. Additionally, we have the capability to structure the IVR in a manner that allows calls to be monitored by a third party, for the purpose of evaluating call center performance.

Our internal reports for contract management include all measures of contract performance, including the following:

- 100% of all inbound and outbound calls are documented and maintained in our CRM.
- Fully operational and accessible agents during the timeframe required by the contract.
- 95% of monthly inbound calls are answered within 3 rings or 15 seconds.
- 100% of voicemails, callback requests, and inquiries are returned within one (1) business day.
- Abandoned calls do not include dropped calls.
- Monthly abandoned calls represent 5% or less of incoming calls, regardless of queue placement.
- Call queue wait time does not exceed five (5) minutes, regardless of queue placement.

We will provide detailed weekly, monthly, quarterly, and annual cumulative data to DPSQA as requested. Data will reflect trends using tables, charts, or graphs. Our typical suite of reports includes the following data points:

- Number of incoming calls
- Number of outbound calls
- Number and percentage of calls received by subject
- Number of calls routed to voice mail
- Return call requests
- Percentage of calls returned within one (1) Business Day
- Number and percentage of answered calls
- Average speed to answer
- Average and maximum talk time
- Number of outbound calls (voice and IVR automated)
- Number and percentage of calls abandoned, average time to abandon, maximum abandonment times
- Number of calls in the queue, average queue wait time, maximum queue wait time
- Number and percentage of first call resolutions
- Number and percentage of escalated calls beyond the customer service representative
- Number of individuals requesting specialized assistance

We are proactive in addressing issues. During a call surge, we route 100% program surge calls to 80% of Customer Support Representatives. Our response time is outstanding, earning us high marks from

our existing partners. According to a 2020 Customer Satisfaction survey, Palco received a 98% approval rating from Employers and 97% from Employees on the programs that we serve.

During the inception of Electronic Visit Verification (EVV) in Spring of 2021, Palco supported the AR project implementation by increasing staff and in the call center for 6-8 weeks. This increased allocation of resources was critical to the success of the project for stakeholders. Palco customer support provided education and technical assistance daily to Arkansas stakeholders to ensure the adoption of the new technology was successful and as minimally impactful as possible. During this time, the Palco Customer Support Center absorbed an increase of calls by 48% which we handled with ease ensuring wait times, while slightly increased, never exceeded a threshold of 9 minutes. Manageable weight times paired with a live and knowledgeable specialist to assist stakeholders is the foundation of the Palco customer support team.

The following charts, **Figures 37-42**, reflect Arkansas specific Customer Support Center's average talk time, inbound and outbound calls.

Figure 37: Arkansas Average Talk Time 1/2019-3/2022
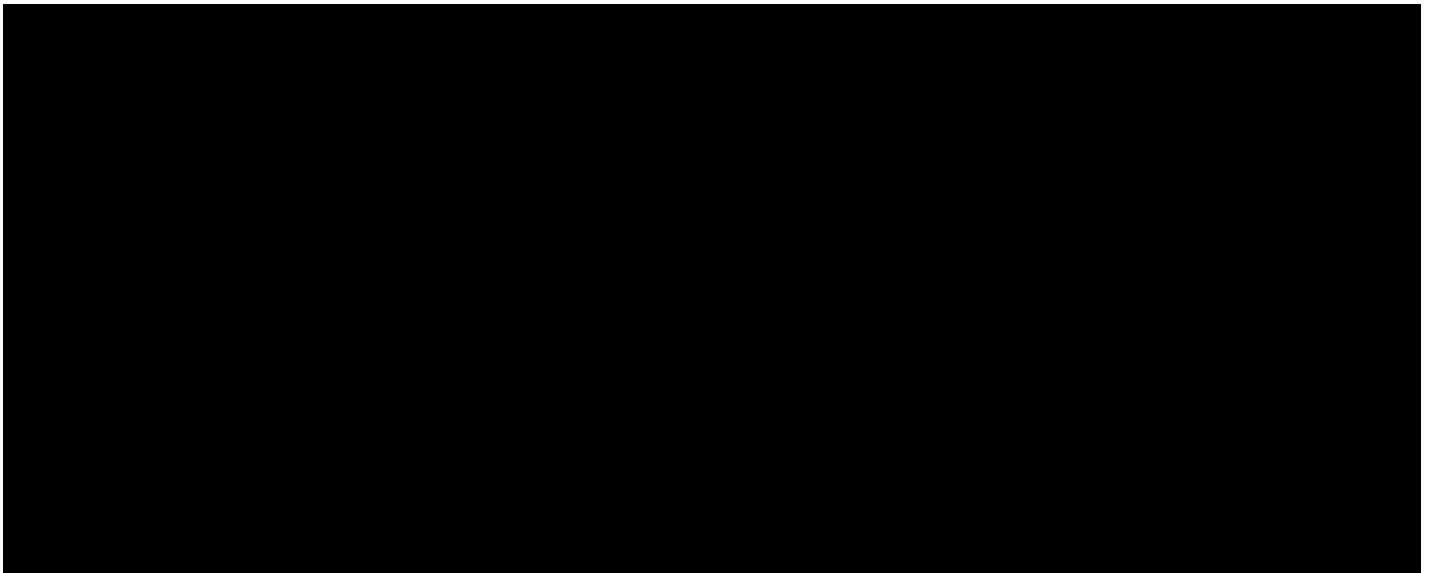
Figure 38: Arkansas Incoming Calls 1/2019-3/2022
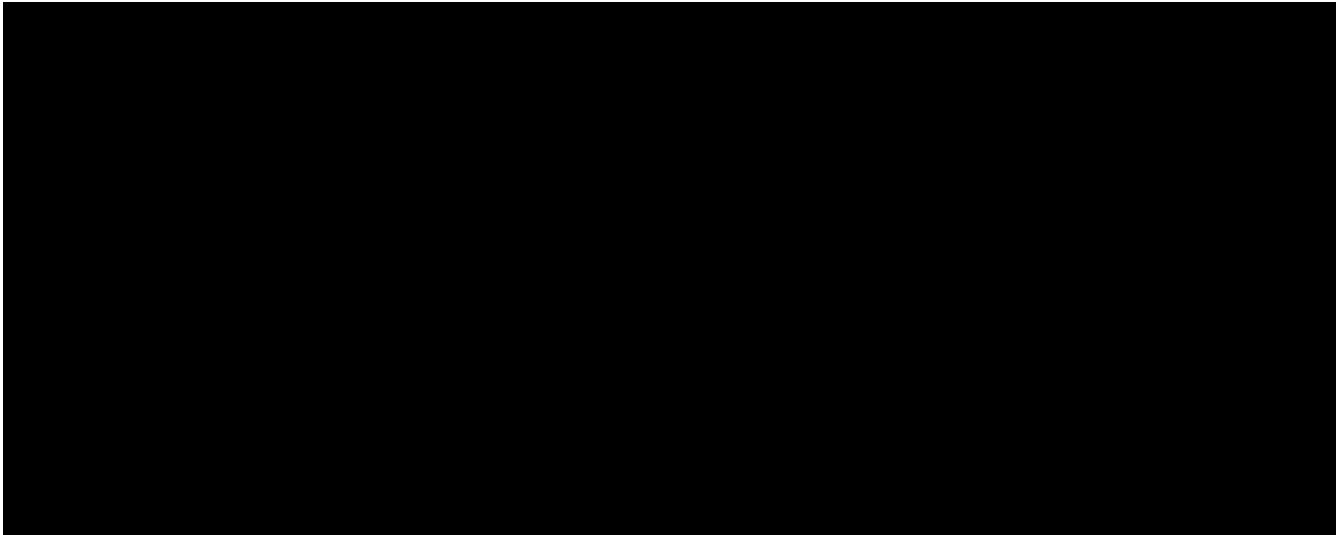
Figure 39: Arkansas Outbound Calls 1-2019-3/2022
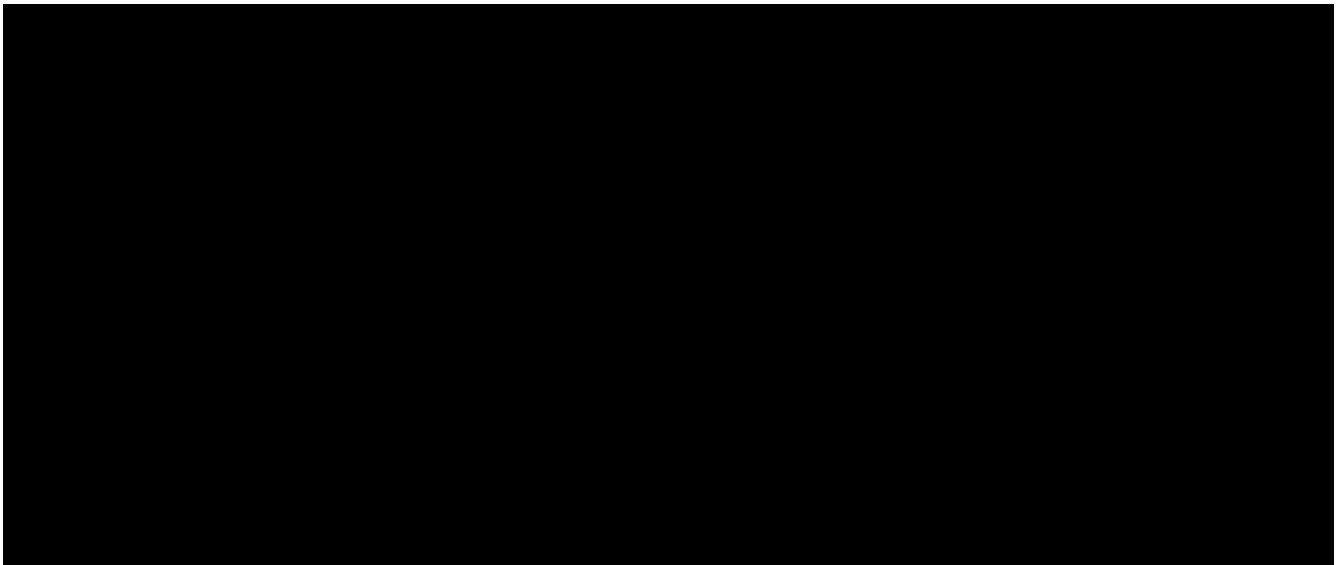
Figure 40: All Programs Average Talk Time
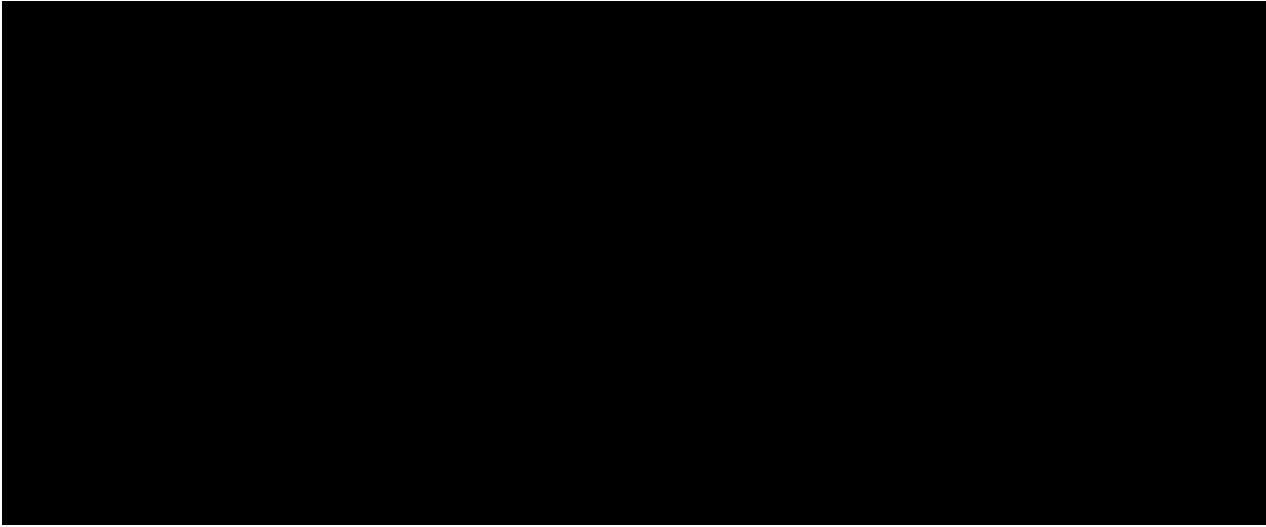
Figure 41: All Programs Incoming Calls
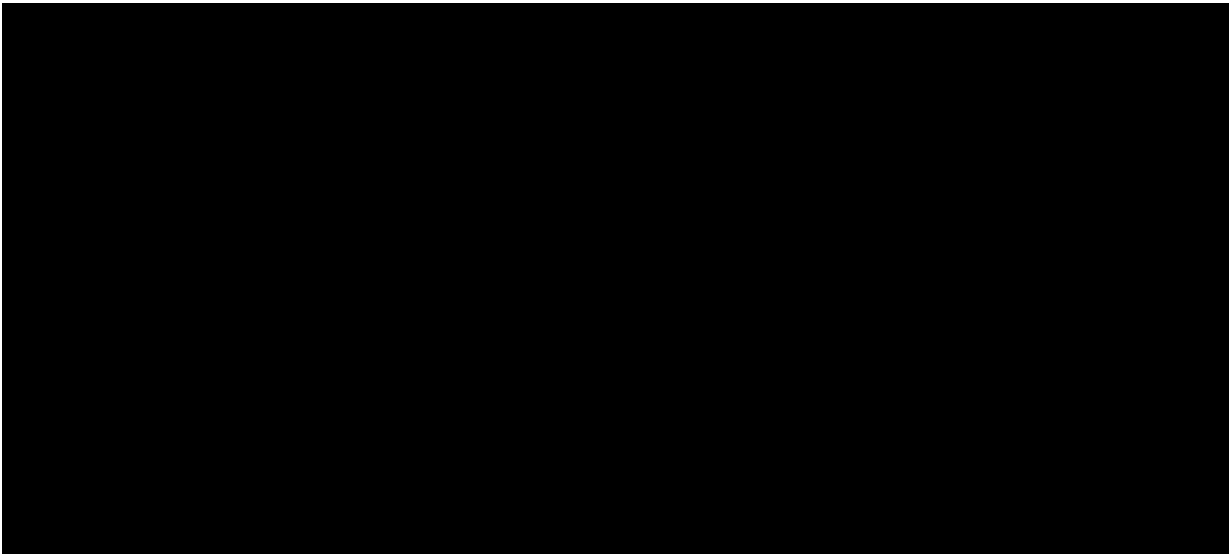
Figure 42: All Programs Outbound Calls

E.10. Education and Outreach

We offer a comprehensive approach to stakeholder Education and Outreach, as outlined on pages 181-194, exceeding the requirements in the Scope of Work of this RFP. Examples of educational tools currently used by Palco Counselors (Support Coordinators) to engage program Participants/Representatives and their Employees can be found in Appendix 9.

Palco values education and training in all aspects of our business both internally and externally as evidenced by our dedicated in-house training team of self-direction experts. Knowledgeable users of self-directed services are a key component to a successful program, and we know that when people are informed, they are empowered. DHS program staff and other identified users will gain knowledge about self-direction and related supports through the receipt of effective skills training which Palco provides in a variety of formats and styles.

E.10.A. Providing Education and Outreach

As the incumbent, Palco has established meaningful relationships with stakeholders across the State. Through these relationships, we stay in touch with what the Participants/Representatives and their Employees need and value most. These relationships and the strong Palco reputation ensure stakeholders know that Palco is an organization that comes with knowledge and experience they trust.

Figure 43: Recipe for Success

Recipe for Successful Education and Outreach

Geographically Located, Person Centered Support
Palco provides a premium service approach to Support Coordination with trained staff located in the community where the Participants live.

Quarterly and Annual Monitoring
Visits with the Participant/Employers assigned Support Coordinator are completed quarterly at a minimum and annually face-to-face.

Change and Issue Tracking
Support for issues and any changes in condition addressed quickly. Monitoring and documentation to assist the program staff and provide detailed records.

Self-Direction Tool Kit
"Tools" or educational fact sheet resources that can be used as talking points and leave behind resources for the most common self-direction topics and needs.

COUNSELING SERVICES

Counseling Services with the person at the heart. Palco knows that with the great reward of self-directed services, comes great responsibility of directing and managing care. Palco first began providing Counseling Services in 2014 with the Arkansas self-direction program. It was at that time that we became advocates for the educational and supportive component that counseling provides clients that are self-directing their care.

Palco's Counselors are participant-outcome driven. The Medicaid participant is the focus of self-direction, and thus, of our operations. A major goal of our person-centered approach is ensuring that the service delivery model chosen by the participant is the right model for him or her. We want absolute assurance that those choosing to direct their care do so with the knowledge and ability to accept and fulfill employer and programmatic responsibilities in the self-directed service delivery model.

The Palco Counseling staff also performs the following important tasks:

- Collaborating with the participant's waiver case manager (DHS nurse) as appropriate.
- Participating in development of the person-centered Service Plan (PCSP) including the risk assessment process.
- Supporting the enrollment process by explaining paperwork and providing both hands-on and phone assistance throughout this process.
- Assisting the employer with developing the skills needed to perform employer duties, such as hiring, firing, training, and scheduling their employees; drafting job descriptions; and monitoring service delivery and payments to their employees.
- Assisting in the development of the initial backup plan.
- Transitioning participants to other services as needed.
- Suggesting training refresher courses for Participants/Representatives.
- Staying current on changes in services, self-directing employees, representatives, or the participant's condition or information.
- Providing translation services as needed.
- Reporting critical incidents and suspected fraud, waste, abuse, and neglect.
- Training the Participant/Representative on the importance of documenting key tasks, such as progress notes.

Palco Counselors have access to all financial records and transactions related to the program participants as part of the web-based Case Management Portal (CMP). As a result, they provide real-time answers to payment and utilization questions, troubleshooting for payroll issues and solutions when problems arise.

Palco's person-focused Counseling Services enable participants and their representatives to quickly understand their rights and responsibilities and to make informed decisions about their services. We

regularly hear from participants and their families—some of whom have experienced the institutional medical route firsthand — about the profound impact our work has on their lives, allowing them to stay in their homes and enjoy their families, while attaining better quality of life outcomes. We are committed to ensuring that the families we serve have choice and control in their care, and we do this through the right staffing.

As outlined in Section E.5, Palco has prescribed a framework for the initial education and outreach approach to meeting stakeholder needs with a person-centered formula. To summarize, Palco's approach includes several key items that make up the recipe successful education and outreach. Within this high touch model of person-centered education and training, Palco has developed several tools to assist with the dissemination of information and our unique approach to education on self-direction. We call the framework for this the "Support Coordination Tool Kit".

Figure 44: Self-Direction Tool Kit

Main Tools are comprised of items that guide the framework and overall curriculum for training and on self-direction. These items include:

- ✔ **Employer Manual** is an introductory guide on the AR program, policies, procedures, and the mail functions of being a self-directing employer. This is used for initial certifications and employer changes.

- **Support Coordinator Manual (Orientation and Skills Training Guidebook)** is an internal supplemental guide to the Employer Manual that the Support Coordinator uses to guide the way they teach the information. It may be used as a script if needed and while support coordinators are learning to fine tune the details of their educational rhetoric.

- **SC Administrative Handbook** is a company compliance and policies manual that covers the unique aspects of the position. Topics like time management, home visit safety, strong documentation practices and managing a caseload are all covered. This document is maintained collaboratively between the Palco Human Resources Department and the leadership team of the Palco Arkansas line of business.

Specialty Tools or companion guides as they are often referred to, are used as needed to provide support or enhance someone's knowledge of the self-directed program based on a specific topic area. These resources should provide the knowledge base for a Support Coordinator to provide 1-1 support to a Participant/Employer but also serve as a written resource to be provided via email following the conclusion of a visit. Some of these specialty tools include:

- **EVV Companion Guide** includes all training resources, frequently asked questions, user guides and links to recorded videos to help ensure the Employer understands the requirements to comply with the Electronic Visit Verification mandate and ensure they have everything necessary to train their caregivers to follow the mandate.

- **Recruiting Companion Guide** includes resources and guidance on how to recruit and hire qualified direct support professionals / caregivers. This resource includes information on writing a good job description, posting a job ad, interviewing tips, checking references, and making an offer. It also provides an overview of the steps to get enrolled with Palco and working with the Palco Enrollment team.

- **Employee Management Companion Guide** provides an overview of typical tasks associated with employee management and tips for being successful. Some of the topics include performance reviews, training, scheduling, developing a corrective action plan and terminating a worker.

- **Budget Management Companion Guide** provides a concise refresher of the cash expenditure plan, what goods and services are allowable, and the budget methodology information.

- **Fraud, Waste, and Abuse Companion Guide** is a reiteration of the employer manual covering this essential information.

- **Program Compliance Companion Guide** covers all common program rules and policies that are unique and critical to the Arkansas self-directed program. This tool is typically used to address issues that come up with program compliance and corrective actions.

- **Connect Reports Companion Guide** provides detailed instructions for employers to view spending/utilization and payment details on-demand via the Palco time entry system, called Connect.

Extra Tools are beneficial resources, not used as often or in every situation, but exist to provide program participants with the maximum amount of support and guidance. Some of these optional templates include:

- ✔ **Payment Stub Companion Guide** is a "how to read your paystub" resources for caregivers.
- ✔ **Health Care Emergency Card template** for Participants to document their personal health information in case of an emergency.
- ✔ **Program Enrollment Process** provides an overview of how to enroll in the AR Independent Choices program.
- ✔ **Backup Care Quick Decision Tree** is a resource to help plan for and document backup care if a worker does not show or an emergency happens.

Each of these resources can be found in **Appendix 9.**

In addition to the Palco-created tools, a variety of external resources are also kept at the Support Coordinator's fingertips to provide to an Employer should they need them or have questions on the subject. These include:

- ✔ **Blood Borne Pathogen Fact Sheet** from Occupational Safety and Health Administration (OSHA)
- ✔ **Universal Precautions Flyers** from the Centers for Disease Control and Prevention
- ✔ **Hand Washing resources** from the Centers for Disease Control and Prevention
- ✔ **COVID-19 Protocols and Safety Guidelines** from the Centers for Disease Control and Prevention
- ✔ **Safe Lifting and Moving for Caregivers** from the Centers for Disease Control and Prevention
- ✔ **Local resources** from community outlets such as food banks and financial assistance

ONGOING OUTREACH AND SUPPORT

To ensure Participants/Representatives have access to ongoing support and their questions are always answered, the assigned Palco Counselor will complete a check in with the Participant/Representative quarterly, at a minimum, as well as a required annual face-to-face visit.

During this contact, the Palco Counselor will use a monitoring tool to collect information and document the individual's self-direction needs and challenges and their ability to continue serving as an employer.

Some of the standard monitoring questions include:

- ✔ Describe how the self-directed program meeting your needs.
- ✔ Are you experiencing any challenges with participating in this self-direction program? How can I help?
- ✔ Do you need help with anything else or have any unmet needs?
- ✔ Have you used your backup worker? If yes, please describe.
- ✔ Is there anything we need to discuss related to your role as an employer or your ability to continue acting as an employer?

The documented responses and an overall summary of the monitoring visit will be captured and stored within the Palco Case Management Portal (CMP). Professional users, like DHS program staff and other identified users, will have access to this information and contact notes on demand. **See Figures 45 and 46.**

Figure 45: Support Coordination/Counseling Monitoring Tool
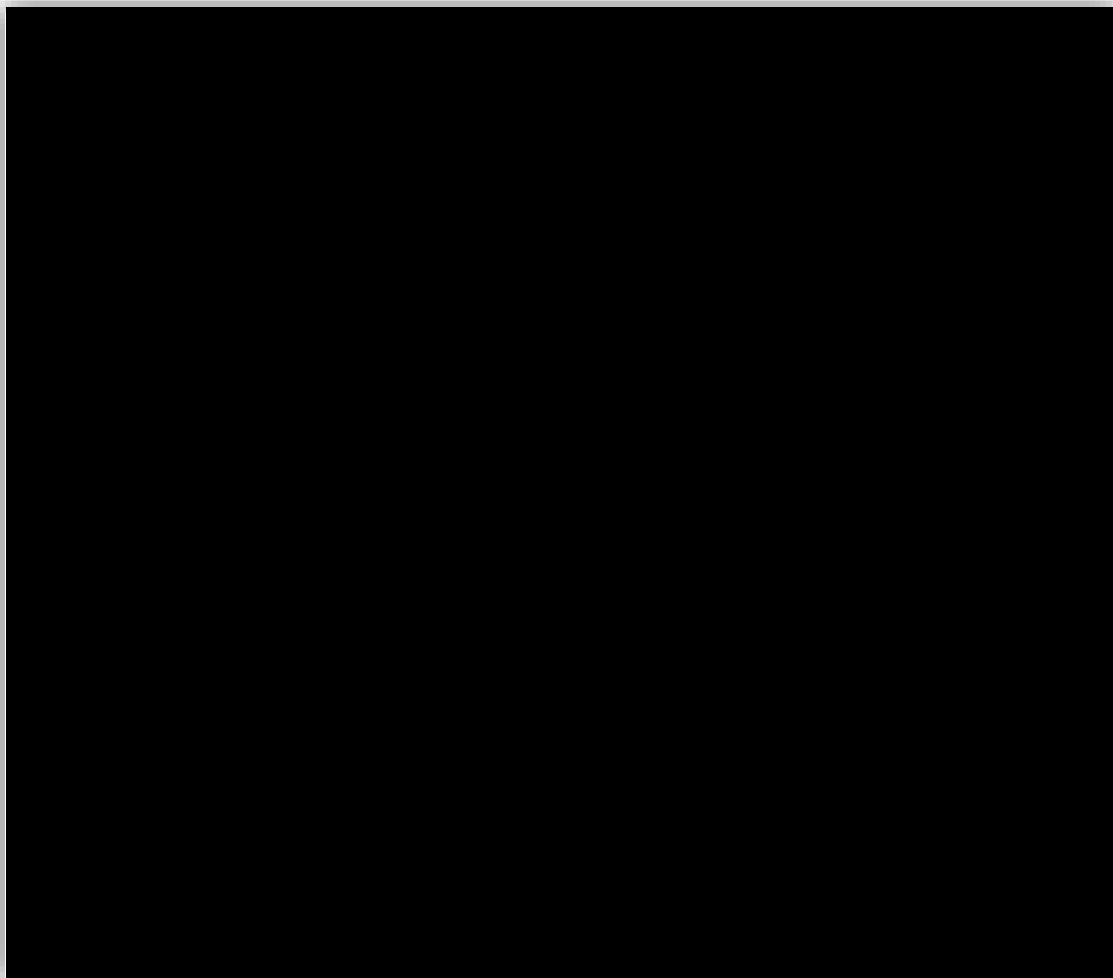
Figure 46: Documentation of Outreach History
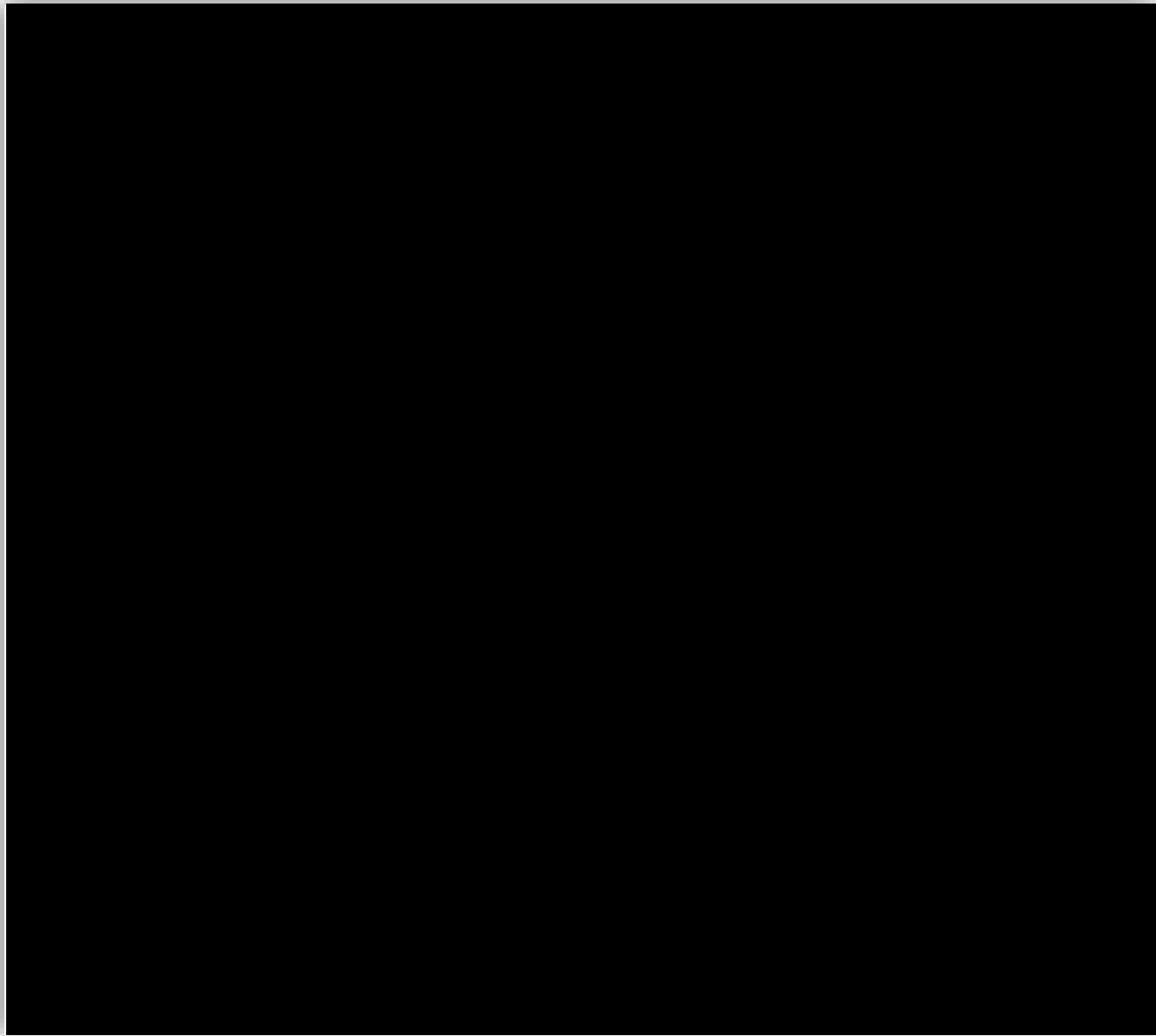
Palco Counselors will use the propriety "Self-Direction Toolbox" of resources at their disposal to provide additional training and refreshers on topics if necessary. For example, if a Participant/Representative expressed to the Palco Counselor during a monitoring session that they were struggling with recruiting/retraining quality caregivers, the Palco Counselor would provide information and training support on the topics of being a good employer, writing a quality job description, and being creative with recruiting. Fact sheet resources such as the "Employee Management Companion Guide" and "Recruiting" will be provided and left behind for the Participant/Representative based on their specific areas of need. Every monitoring session and interaction between the Palco Counselor and the Participant/Representative is tailored to the individual's needs including how they like to receive support whether it be in-person, via phone or via

emailed resources and communication. This person-centered approach to all interactions builds a rapport and long-standing relationship between the Palco Counselor and Participant/Representative.

"Palco has allowed me to stay in my home because I am unable to walk on my own. I am able to quilt, go to lunch, and go shopping thanks to the help of my caregiver. Having a paid caregiver allows me to get around my home. All of my experiences with support coordinators have been great. My support coordinator calls me every month to check on me and always helps my caregiver when she has a question. My caregiver had troubles with Connect a few times and our support coordinator has always guided us in the right direction."

- Melba H. from Arkansas (Used with permission)

CHANGE IN CIRCUMSTANCE OR CONDITION

In addition to the regular quarterly monitoring outlined above, the Palco Counselor stays in tune with the Participant's services and provides additional training and support as necessary. Should the Palco Customer Support team or Counseling staff receive notification of a change in circumstance, such as a change in employer authority, a change in budget or health conditions, or caregiver turnover, the Regional Manager/Counselor is notified within our internal reporting channels and the Palco Counselor is deployed to assist.

- **Changes in condition, including the possible contributing factor.** For example, a fall that resulted in a bone fracture may warrant a change in functioning. This will need to be relayed to DHS program staff to determine whether a DHS nurse needs to temporarily adjust the participant's budget.

- **Changes in the home environment or hygiene of the participant.** These may indicate a problem with the supervision or management of the self-directing employee. The Palco Counselor should document their observations and any interventions put in place. If necessary, the visit should be noted as "intervention" if the participant's health and well-being are threatened. The Counselor will follow-up with a second home visit within the month to ensure the participant's needs are being met.

- **Employer's skills and abilities.** If additional training is needed, the Counselor will provide the necessary training, document the reason for the training, and plan to follow back up soon.

- **Employee is not present when work is being documented on the timesheet.** Employees generally provide services at the same time each day. If the Employee is not present at the time generally documented on timesheets, the Palco Counselor will contact the Regional Manager or Palco FMS staff so that the timesheet is monitored. When the timesheet is submitted to Palco, if time was claimed when the Employee was not present then a fraud report will be made to the Office of Medicaid Inspector General.

- **Check on back-up workers.** Backup workers should be used occasionally to assure that they are still available when necessary.

- **Document any emergencies or risk mitigation strategies.** Any risky behaviors or medical emergencies should be documented. If necessary, the Counselor will coordinate additional planning with the Participant/Representative.
- **Change in Employee.** If Palco Enrollment staff inform a Counselor that a Participant/Representative have hired a new Employee, outreach will occur to ensure training needs are met for a successful payroll.

During the annual face-to-face visit, the Palco Counselor will assess whether participation in the self-direction program produced any negative consequences to the Participant. The Counselor will also document any regression identified in the Participant's mental, physical, or social functioning and whether this regression is the result of participation in self-direction and communicate that via internal channels and DHS program staff as necessary.

Should a situation arise where the Participant's health, safety or well-being is at risk, the Palco Counselor is deployed to provide intervention and support immediately. Being geographically located within the community where the Participant lives, makes that possible. Supporting documentation is collected and provided to DHS program staff to ensure issues are mitigated quickly. Some examples of these instances may include:

- A lack of caregiver support and **significant underutilization of budget funds causing the participant to go without their basic needs being met.**
- A situation meeting **the criteria for fraud that requires an investigation and oversight of the Medicaid funds.**
- **Any reports of abuse or neglect.** Palco is a mandatory reporter of coercion, neglect, or abuse. Any such reports must be sent to DPSQA within one (1) business day. Once Palco staff receives the report a report is immediately files with local law enforcement or Adult or Child Protective Services.
- **Labor violations.** Labor violations include failure to provide a safe and healthy working environment for the caregiver and failure to abide by wage and overtime laws.

To support a Participant's continued participation in the self-direction program, Palco Counselors work with the Participant/Representative on a correction action plan documenting what is needed for ongoing support and resources. This action plan will be reviewed regularly and followed up on by the Participant/Employer, Palco Counselor, Regional Manager, DHS program staff (when necessary) and the Palco Account Manager to ensure risks are mitigated and issues do not persist.

During the ongoing quarterly and annual contacts, the dedicated Palco Counselor will complete check ins with each Participant/Employer to ensure their needs are met. The Counselor will collect information for the standard monitoring questions and use these educational tools to tailor the meeting fully to the individual Participant/Employer needs.

If an issue with the Participant/Employer occurs or a there is a change in condition that requires support from the Palco Counselor, the tools will assist with their ability to provide knowledgeable and detailed support.

STAKEHOLDER OUTREACH

We propose a series of educational/outreach sessions each year in different areas of the state for DHS support staff and case managers (DHS nurses) as well as other stakeholders. We recognize the significant impact on the Participant's ability to self-educate and determine their options for home care services. Training nurses and those in constant contact with program participants helps everyone provide well-rounded knowledge-based support and education about what services best fit the Participant's unique needs.

SELF-DIRECTED ADVISORY PANEL

Beyond training, Palco would welcome and happily facilitate the creation of an Advisory Panel formed by staff from Palco, *IndependentChoices* Participants, Representatives, self-directing Employees, DHS staff, and representatives of key organizations who have relevant expertise to provide advice, oversight, and guidance in the management and growth of the self-direction program. The goals and objectives of this committee may include:

- Identifying potential self-direction program or policy improvements.
- Monitoring the quality of the program as it evolves.
- Providing advice (and sometimes making decisions) about changes to program policy, processes, and/or procedures.
- Providing valuable feedback and insight into program participant experiences.
- Identifying gaps where training and information about self-direction is needed such as in rural areas or sectors that have undergone frequent staffing changes and turnover.

We welcome the involvement of the DHS *IndependentChoices* Program Manager to attend meetings of the Advisory Panel, reporting on policy updates and other initiatives that may impact program participants. They may provide guidance on issues raised, help balance conflicting priorities, foster positive communication outside of the committee regarding progress and outcomes, actively promote the self-directed services and person-centered planning, and contribute to the evaluation of innovative ideas, and their actual impact.

We facilitate a similar advisory group in Pennsylvania and have witnessed first-hand the kinds of collaboration, problem solving, and positive innovation that occurs when you bring together people with a vested interest in a common goal: improving the delivery and outcome of self-directed services.

OUR TRAINING APPROACH

Palco continues with our flexible learning approach using various methods for delivering training content of the existing and potentially new Case Management Portal (CMP) configurations, as well as EVV functionality. All training is scheduled utilizing an online registration process with links sent to

the user, which helps with tracking and maintaining training attendance records. Palco maintains a variety of short training videos that are accessible on demand, 24/7 for all stakeholders on the topics of Intake (enrollment), Connect (time entry), and reports like utilization and pay stubs.

As the incumbent, Palco has years of experience with understanding program requirements and will provide initial and ongoing skills training, as requested and/or as required to ensure the Participants/Representatives are performing their employer duties well and complying with all applicable policies, regulations, and requirements to the best of their ability with or without support. The Palco Counselor will use the cash expenditure plan to guide the discussions and to work collaboratively with Participants/Employers, specifically those who may need or prefer on-going support.

In the spirit of collaboration, Palco seeks to fully include all relevant and potentially impacted stakeholders in the design, delivery, and evaluation of their services and supports, including their need for assistance, education, mentoring, training, and support.

Palco has collaborated with DHS program staff and will continue to readily implement recommended and/or required training including topics related to self-direction, person-centered planning, supported decision making and others designated by the Department.

The training curriculum and related materials will be submitted for approval to the contract monitors. Orientation and training of Palco Counselors will be open to DHS program staff. Palco will keep records of attendance and training materials along with the evaluations. Training sessions will occur quarterly, and we will report on them in the monthly report in which they occur.

Palco's professional trainers conduct engaging, hands-on training using a sandbox environment to train dedicated Palco support staff dedicated to the *IndependentChoices* program. The same training is offered to DHS program staff and other stakeholders (including DHS nurses) as appropriate. While leveraging expert knowledge of adult learning theory, the features of CMP are demonstrated interactively. **Table 3** below summarizes various training methods and training resources available.

Table 3: Training Methods and Materials

Type of training	Audience	Training material
Train the trainer sessions	Palco Counseling staff, DHS program staff	✔ Workshops ✔ Presentations ✔ Webinars ✔ Video tutorials ✔ Manuals ✔ Reference guides ✔ One-page "cheat" sheet ✔ FAQs

Type of training	Audience	Training material
Enrollment Training (Employer)	Participant / Representative (Employer)	✔ Presentations ✔ Webinars ✔ Video tutorials ✔ Manuals / Reference guides ✔ One-page "cheat" sheet ✔ FAQs
Payment Training (Employer)	Participant / Representative (Employer)	✔ Presentations ✔ Webinars ✔ Video tutorials ✔ Manuals / Reference guides ✔ One-page "cheat" sheet ✔ FAQs
EVV Training (Employer)	Participant / Representative (Employer)	✔ Presentations ✔ Webinars ✔ Video tutorials ✔ Manuals / Reference guides ✔ One-page "cheat" sheet ✔ FAQs
Payment Training (Employee)	Caregiver (Employee)	✔ Presentations ✔ Webinars ✔ Video tutorials ✔ Manuals / Reference guides ✔ One-page "cheat" sheet ✔ FAQs
EVV Training (Employee)	Caregiver (Employee)	✔ Presentations ✔ Webinars ✔ Video tutorials ✔ Manuals / Reference guides ✔ One-page "cheat" sheet ✔ FAQs

STAKEHOLDER COMMUNICATION

Our WCAG 2.1 compliant PalcoFirst.com website provides critical communications, trainings, and forms. For urgent communications we provide a link on the Palco homepage to an expanded newsfeed article explaining the detail, actions required (if applicable) and contact information.

Palco is in full compliance with standards and protocols adopted by the Secretary under sections 1104 and 1561 of the Affordable Care Act. All web-based applications employ security certificates and encryption protection, and our website and software solutions (Intake, Connect, and CMP) are 508-compliant.

Design Principles for Ease of Use

At Palco, we recognize the importance of easy-to-use, user-centric websites and software applications, especially for elderly, physically disabled or intellectually disabled users. Accordingly, we have committed ourselves to the following features and principles.
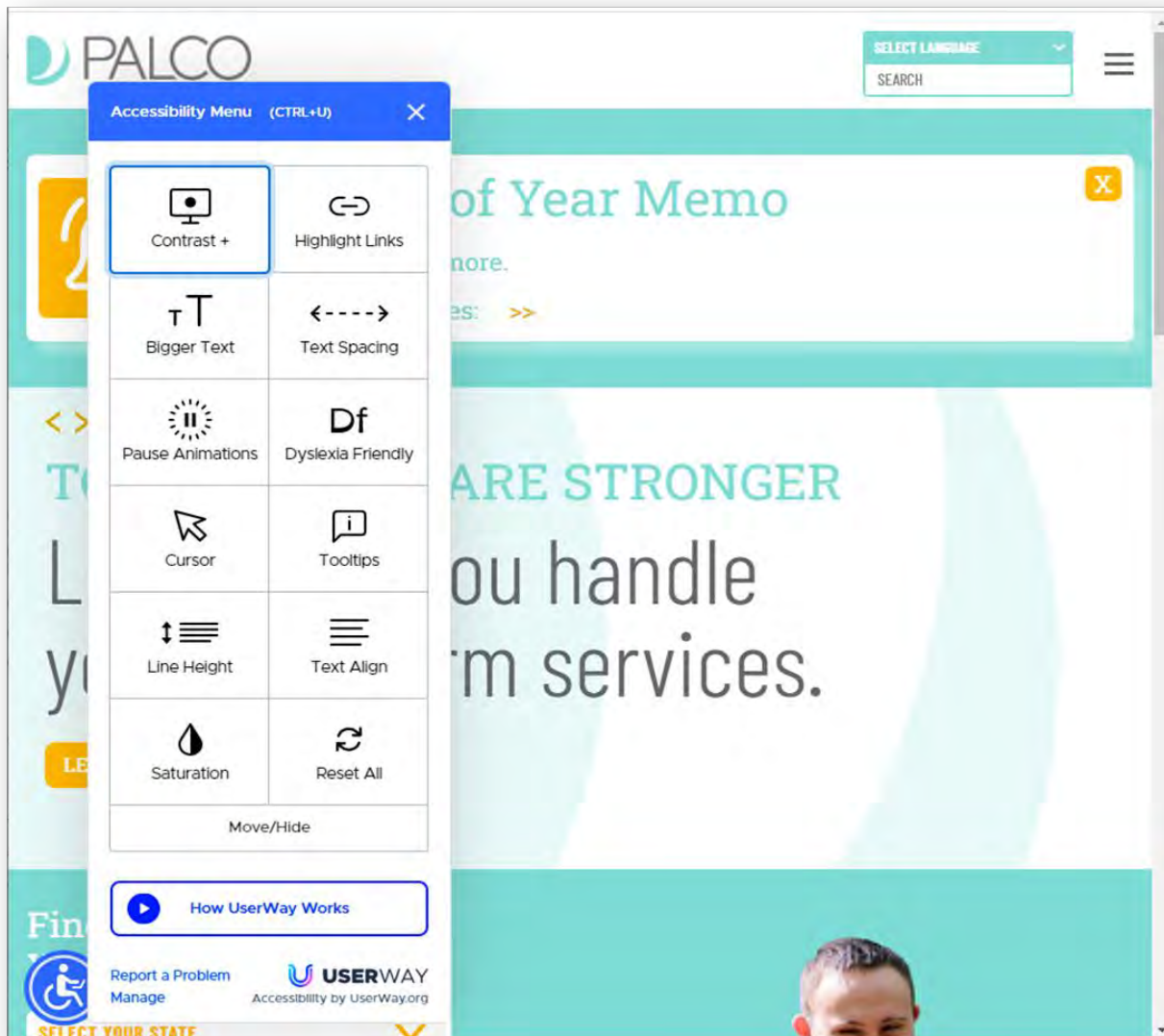
With a few clicks, visitors may change the visual characteristics of a web page: contrast, hyperlink visibility, text size, text spacing, and many other attributes to better read and understand the webpage contents.

Palco maintains regular communication with all program stakeholders. We are proud to have a multi-channel approach toward communication. Palco's ADA compliant website, eBlast, and social media are strategically deployed to communicate changes and provide additional forms or information. A general secure email inbox is used for submitting questions and inquiries electronically. Web traffic statistics indicate that these channels have been effective at communicating new information.

These communication channels include, but are not limited to, messaging on our program-specific website, tailored call center hold time messaging, as well as eblast messaging. We are proud of our eBlast communication and consistently score higher than the industry average in our open rate and click-through rate. At the time of this writing on 5/13/2022, **our open rate continues to hover around 15% higher than the industry average**. See **Figure 47** below.

Figure 47: Palco's Open Rate 5/13/2022
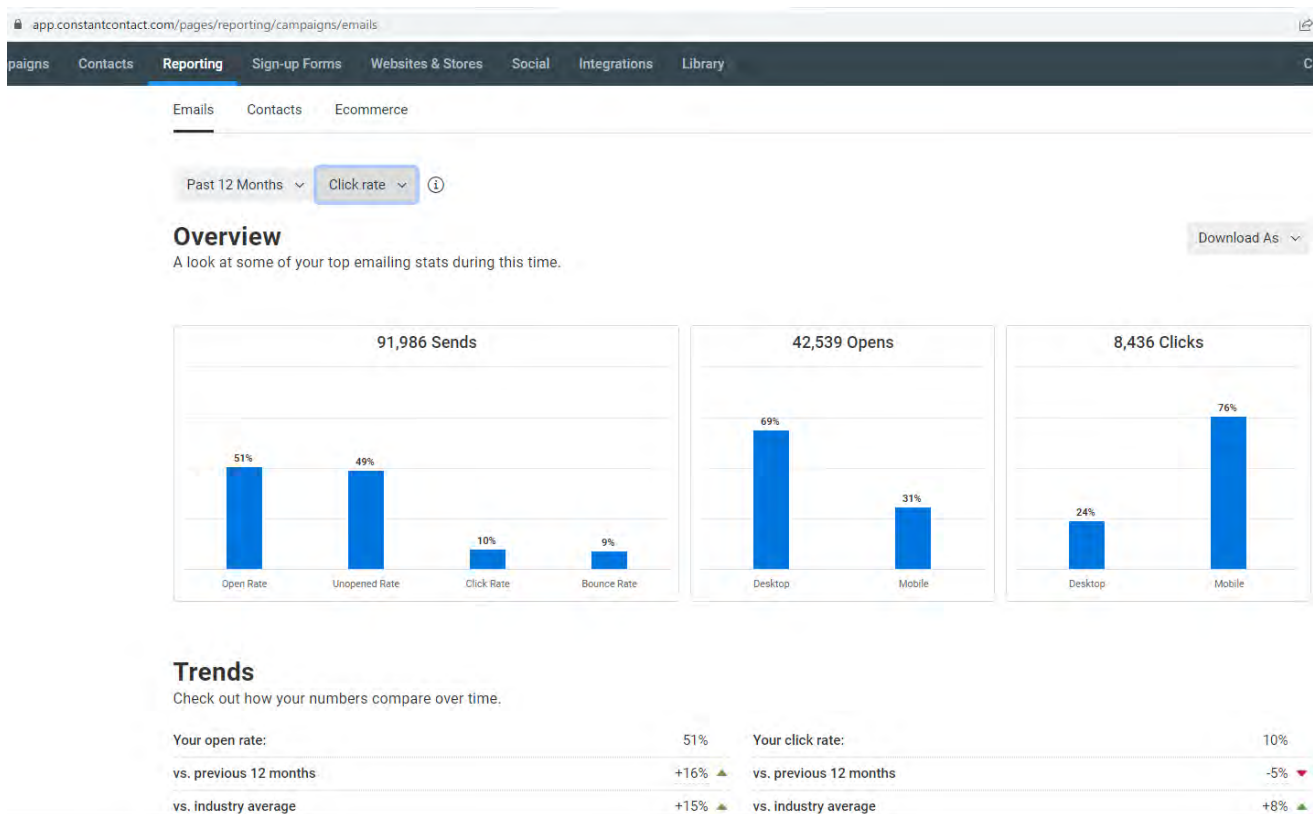
E.11. Fraud and Abuse Compliance

Palco exceeds the requirements outlined in the Scope of Work, Section 2.5.16. Our Fraud and Abuse Compliance Plan is briefly described on pages 195-196 and in greater detail in Appendix 10.

Palco has internal controls and policies and procedures in place that are designed to prevent, detect, and report known or suspected fraud and abuse by participants, workers, or any other party. Palco has received recognition for its partnership with state agencies to detect, mitigate and report fraud. Palco has adequate staffing and resources to investigate unusual incidents and develop and implement corrective action plans to assist us in preventing and detecting potential fraudulent and abusive activities. Quarterly training focuses on preventing Medicaid fraud and educating staff on key areas, such as the False Claims Act and mandatory reporter statutes.

E.11.A. Fraud and Abuse Compliance Plan

We consider fraud prevention, education, and reporting one of our most important responsibilities. In maintaining accountability, customer support, and excellence in all programs, we have made fraud prevention a high priority. We utilize detection activity resources and tools from participant education and training to technological deterrents. For example, our CMP suite of services includes Connect, the Palco time entry solution, which is integrated with Electronic Visit Verification (EVV) and ensures mandatory time entry approvals by both Employers and Caregivers before time is processed for payment.

- ✔ We have established a tactical process to prevent, detect, and respond to fraudulent activities.
- ✔ Training for Employers as well as Caregivers about the responsibilities of self-direction.
- ✔ Effective communication paths for reporting fraud.
- ✔ Training for our own staff and program stakeholders on the roles and responsibilities of being a mandatory reporter.
- ✔ Monitoring with internal controls and policies and procedures designed to prevent, detect, and report known or suspected fraud and abuse by Employers, Caregivers, or any other party; and
- ✔ Investigation of fraud and financial abuse allegations in a timely manner, involving appropriate members of our management and leadership team
- ✔ Palco maintains a several channels for reporting any fraud or abuse including our customer service toll free line and a dedicated email box privacy@palcofirst.com
  - o The privacy box is monitored by our Privacy and Security Officer. Any complaints or reports of fraud, waste and abuse are followed up on within one (1) business day following the appropriate program policies and procedures.

    o   For the AR program, any reports are triaged to the necessary DHS/DPSQA staff for follow up via the program account manager.

According to the National Resource Center for Participant-Directed Services (NRCPDS, "Research indicates there is no increased risk of fraud within participant-directed programs. In both [self-direction and traditional agency] services, quality management systems are used to prevent fraud. Participant direction is an efficient model in its own right: By directly linking services and support to each person's needs and preferences, it promotes expedient service delivery.[6]
Even so, Palco remains fiscally diligent to protect against waste and fraud and remains swift in every instance of abuse with a deterrence, detection, and response protocol.

Deterrence Mechanisms are activities surrounding education, auditing, and community engagement include **education** through orientation and enrollment education, periodic training, employee, and participant flyers; State and Federal criminal **background checks** are completed. The Arkansas Employee/Worker Packet also contains an overview of the employee/worker enrollment process, specifically the background checks and employment eligibility requirements including barrier crimes, the Child Abuse and Neglect Central Registry, and the federal List of Excluded Individuals and Entities (LEIE); community alliance.

Detection Mechanisms are detection components to uncover fraud and misconduct. We know that employees and employers aid by promoting an environment of accountability in their homes by keeping a watchful eye for suspicious activity, and knowing how, and when, to report it. Time evaluations are reviewed by internally and externally, and include pre-pay reports, a direct email to our Privacy officer is provided for reporting concerns, and all Palco employees remain vigilant and are provided fraud, waste, and abuse training.

Palco responds to suspected fraud and reported misconduct with these **Response Mechanisms** once a report is received, our Executive team evaluates and immediately contacts local investigators, and if required outside counsel is retained, there is a referral sent to State and/or Federal fraud units, and corrective action includes self-reporting and a report of findings with outcomes included.

Palco has developed and implemented policies and procedures that emphasize the application of the philosophy of participant direction and foundationally believes in a culturally sensitive, person-centered approach to providing every aspect of program services and supports. Palco continues to employ a diverse group of people who receive training in person-centered philosophy. The commitment to person-centered services is evident. A copy of a **Fraud, Waste and Abuse Companion Guide** is included as **Appendix 10**.

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[6] https://www.appliedselfdirection.com/sites/default/files/Budget%20Crisis%20Toolkit.pdf

E.12. Record Management Process and Miscellaneous
Palco exceeds the requirements set forth in Section 2.5.17 of the Scope of Work. We offer a brief description of our Continuity of Operations Plan on pages 197-198 and in greater detail in Appendix 11. Our approach for providing program Participants/Representatives and their Employees a unique identifier is described on page 198, while our approach for ongoing compliance with federal and State rules and regulations is outlined on page 199. Our approach for capturing all stakeholder communication is described on pages 199-200.

E.12.A. Continuity of Operations Plan (COOP)
We have a comprehensive Continuity of Operations Plan (COOP) for continuity of operations of all services covered in the event of a disaster. An example of our existing **Continuity of Operations Plan** is included as **Appendix 11**. Our plan includes objectives to meet the following provisions:

- Preventing the loss of the organization's resources, such as hardware, software, data, and other information technology assets.
- Minimizing downtime related to information technology.
- Minimizing downtime of the call center.
- Ensuring continuation of critical business practices in the event of a disaster.
- Ensuring that a secondary location meets all our policies and ensures business continuity.
- Protecting and securing all data.

We have an established and separate, dedicated standby facility in the event the COOP is activated to ensure the timely return to regular operations without interruption of data and use of appropriate software that is completely up to date as of the previous day's work. The cold site has the capability to meet all Palco's policies, ensuring efficient production of key tasks.

Annual testing is conducted and updating of the COOP for electronic and hard copy files ensures plan effectiveness. The plan is tested through walk-throughs, simulations, parallel testing, and full-interruption testing. We perform semi-annual assessments of information security risk and disaster management protocols to detect any vulnerability and gauge our ability to return to full capacity as soon as possible after a disaster. Palco, Inc.'s management team reviews the Continuity of Operations Plan quarterly, at a minimum, and makes any necessary revisions.

Palco's emergency preparedness procedures stem from risk-based assessments provided by the Federal Emergency Management Agency (FEMA).[7] Our internal staff policies and procedures and general office safety features are built around these assessments, including the following features:

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[7] Please see CPG 101, Developing and Maintaining Emergency Operations Plans, Version 2 and CPG 201: Threat and Hazard Identification and Risk Assessment Guide.

- Documentation of emergency procedures that include steps to take in the event of a natural disaster by fire, water damage, sabotage, mob action, bomb threats, etc. Such steps include evacuation procedures and other action items.
- Provisions to assure that employees at the site are familiar with the emergency procedures.
- General safety procedures, such as prohibiting smoking, and always keeping our offices locked with access granted only by with the issuance of an ID card.
- Heat and smoke detectors are installed on-site and alert the local fire department, as well as internal personnel, when sounded.
- Portable fire extinguishers are in strategic and accessible areas of our worksites site. They are vividly marked and periodically tested.
- Our site is protected with an automatic fire suppression system.

A detailed Continuity of Operations Plan, general and ongoing preparedness, and staff training on emergency response guards that any crisis will have a minimal impact on our operations. Each member of our COOP team is assigned a specific task. All staff are trained and meet quarterly to review COOP procedures.

The team focuses on specific areas, including information technology, human resources, corporate operations, communications, financial operations, and customer support. The primary role is to guide the disaster recovery process and other members of the team in their specific roles.

During the height of the COVID-19 pandemic in 2020 and 2021, the majority of Palco staff pivoted to remote work. This allowed our organization to continue to provide exemplary services to DHS DPSQA and the participant-directed services program. Our AR-dedicated staff worked throughout the pandemic without interruption, continuing business as usual. Our staff continued to attend meetings virtually, host Advisory Board meetings virtually, and engage with stakeholders to ensure participants did not experience any disruption in services.

E.12.B. Identification System

Palco ID numbers are assigned to all Participants, Representatives, and Employees who initial enrollment. The Palco ID number is used to refer to an individual's case file and the related information pertaining to that account. Palco identifies individuals with their Palco ID numbers instead of their Medicaid ID numbers to protect the individual's private health information and to add an extra layer of security when communicating with individuals through our Customer Support Center.

The Palco Case Management Portal (CMP) automatically assigns a Palco ID number to each new referral uploaded into the database. This number is a unique identifier assigned to each case and is populated on certain forms for easy search in CMP.

Self-directing Employees are also given unique identifiers, but their identification numbers are nine (9) digits composed of the five-digit Palco ID number associated with their participant and the last four (4) digits of the Employee's Social Security Number.

E.12.C. Ongoing Compliance with Federal/State Regulations

We easily adapt to changes in federal and state tax, labor, and program rules and requirements, including IRS changes in reporting, forms, and procedures; Federal and State Department of Labor overtime and wage reporting changes; and state self-directed services program policies and procedures. With each challenge that we have faced, we have provided quality VF/EA FMS and related support at vast cost savings while honing our expertise in the provision of self-directed services.

Palco conducts compliance reviews and monitoring relevant guidance in the provision of participant-directed services for compliance with Federal, state, and local tax, labor, and workers' compensation insurance rules and requirements related to the employment of qualified caregivers.

E.12.D. Capturing All Stakeholder Interactions

Our Palco Customer Support Center tracks all calls received, including complaints, as well as our response through an automated system that combines metrics from GoTo and Microsoft Dynamics Customer Relationship Management (CRM) tool. Each Customer Support agent is required to document 100% of their call interactions through the CRM. Failing to do so impacts their quality assurance score. This call log records the following: contact notes, who made the call, who received the call, the reason for the call, actions taken, any mandatory reporting that occurred, and thorough documentation of the final resolution.

Our CRM tool is a cloud-based tool that allows communication tracking and reporting including an electronic record to generate a synopsis of all communications and to provide a **complete audit trail of communication** to and from all parties. Interactions with other Palco team members outside of the Customer Support Center such as our Enrollment and Counseling staff are also documented in the CRM tool to ensure a complete record of all interactions.

With data consolidated in our CRM, it makes it possible to analyze patterns for call drivers and insights into participant needs and wants. With this tool we monitor our Palco Customer Support Center staff's productivity and improve their customer relationships. Additionally, we have the capability for structuring the communication log to include actions taken, escalations, mandated reporting, and the date of final resolution.

Additionally, our Customer Support Quality Assurance program was developed to ensure that our call center staff are meeting all contract requirements and Palco expectations. We record all incoming calls and review a 10-15% sample of these calls monthly for quality. These call recordings and QA reports will be provided to DHS program staff as requested. We also conduct weekly live call monitoring of our call center staff. This includes utilizing a standardized form to ensure that agents engage the

proper soft skills (greeting, closing, hold-placement), are knowledgeable and courteous, resolve the issue at hand, follow HIPAA guidelines, and meet company expectations. Each agent is given a QA score based on these activities every month, and the QA score is reviewed alongside the agent. Recorded calls are stored for 30 days.

Our internal reports used for contract management include all measures of contract performance, including the following:

- 100% of all inbound and outbound calls are documented and maintained in our CRM.
- Fully operational and accessible agents during the timeframe required by the contract.
- 95% of monthly inbound calls are answered within 3 rings or 15 seconds.
- 100% of voicemails, callback requests, and inquiries are returned within one (1) business day.
- Abandoned calls do not include dropped calls.
- Monthly abandoned calls represent 5% or less of incoming calls, regardless of queue placement.
- Call queue wait time does not exceed five (5) minutes, regardless of queue placement.

E.13. Electronic Visit Verification

For this opportunity, Palco will remain in compliance and exceed the requirements set forth in Section 2.5.18 of the Scope of Work by maintaining our successful and productive integration with FDGS' EVV solution, AuthentiCare. Not only does the Palco EVV solution support the full set of requirements in Section 2.5.18 of this RFP, but also **offers the State the lowest risk, highest success probability in positive EVV customer service and eliminates the timeline necessary to build a new integration.**

On pages 202-204, we provide a brief description of the EVV solution as well as a description of the hosting environment for the Palco solutions presented in this proposal (Case Management Portal, Connect, and Intake) on pages 205-208. Our approach to securing EVV data is outlined beginning on page 208, while a thorough description of how we currently meet the needs of the Arkansas self-direction program and stakeholders is included on pages 210-213. **A description of our ability to support Outcomes Based Certification for the state's chosen EVV solution is also addressed on page 213.** Managing user access is described beginning on page 214. For this proposal, Palco is already integrated with the state's chosen EVV solution and will not need to utilize AuthentiCare as an aggregator.

As the incumbent fiscal intermediary, Palco understands the importance of EVV compliance for the Arkansas program as well as the journey and intricacies that the state has undergone over the last several years to implement. As a preferred partner of First Data Government Solutions (FDGS), the state approved EVV vendor, Palco is able to provide a seamless and unrivaled solution to EVV that meets the demands of CMS/Federal compliance as well as meets the needs of self-directing stakeholders who requires special consideration. The Palco team is already providing an integrated self-direction-centric near real-time, secure claim web services Application Programming Interface (APIs) hosted by FDGS through which we provide Electronic Visit Verification solutions to five other states.

The Palco/FDGS partnership provides DHS seamless integration of services, plus the addition of statewide support teams who understand the special rules related to DPSQA. Palco's Case Management Portal for enrollment, plan management and

> "Palco and AuthentiCare have merged our offerings in 5 different states. We work together in Kansas, Arkansas, New Mexico, Pennsylvania, and Colorado. Each deployment is uniquely configured and together we serve MCOs and fee for service models as well as agency and self-directed recipients.
>
> One of the best examples of our partnerships occurred in late 2020 when the state of New Mexico requested a new fee for service (ffs) jurisdiction be stood up prior to the enforcement of the cures act on January 1st, 2021. In under two months Palco and AuthentiCare worked together to design, build, and deploy a ffs instance of AuthentiCare to save the state of New Mexico $57 million dollars in federal medical assistance percentage (FMAP) penalties. This massive accomplishment was achieved through the outstanding partnership between the Palco, AuthentiCare, and the state of New Mexico and we look forward to writing another success story in the state of Arkansas."
>
> - Grant McKay
>   FDGS, Account Executive

payment processing integrate seamlessly with the AuthentiCare EVV product, allowing the Palco Team to provide a complete one-stop solution for Participants/Representatives and their Employees enrollment, EVV compliance, service monitoring, claims submission and payroll and payment processing.

Palco's integrated solution for EVV utilizes a near real-time secure claim web service Application Programming Interface hosted by FDGS. **The service, which has been in production for 5 years in other states, is used to retrieve visit geolocation and services in near real time as check-ins and check-outs occur.** The web service integration results in a streamlined claim lifecycle with improved monitoring and faster billing submissions that allow for a high-quality user experience and quality assurance.

In our current engagement with DHS, Palco has demonstrated our commitment to open communications and operations status updates through Palco-led conference calls and status reports. We look forward to a continued discussion with DPSQA and its stakeholders as needed while we transition the DPSQA programs and work to incorporate new requirements outlined in this RFP. These calls provide visibility into previous weeks' activities and opportunities allowing DPSQA and Palco to effectively address and discuss partnership topics as needed. Items include but are not limited to procedural matters, policy clarifications, reported issues, and EVV-specific items.

E.13.A. Description of EVV System

Palco and FDGS provide FMS and EVV services together in five states, including Arkansas. In each instance, Palco generates payroll for self-directing employees based on the EVV data collected by AuthentiCare. See **Figure 48** for a visual representation of the Palco-FDGS Integration.

Arkansas needs an EVV solution and vendor that can successfully deliver and deliver fast. With FDGS and AuthentiCare, the delivery is complete and already operational – **no other vendor can make this claim.**

Figure 48: Palco/FDGS AuthentiCare Integration
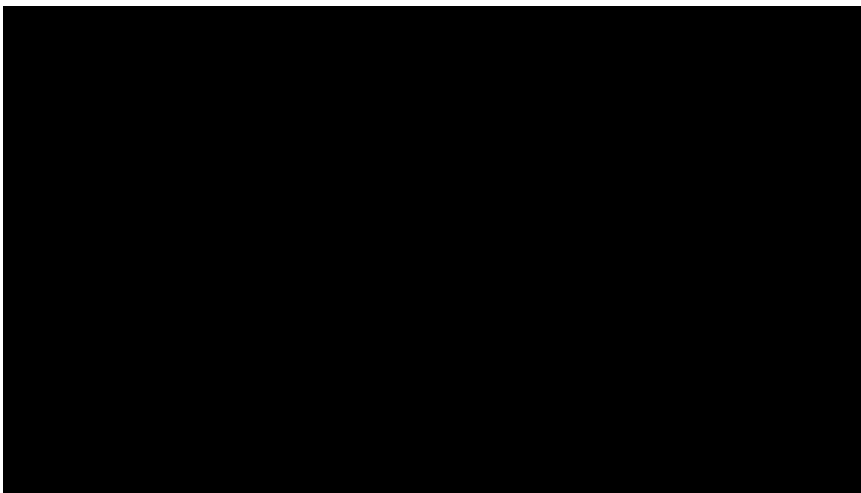
FDGS' INNOVATIVE MOBILE APP APPROACH

The most innovative features are provided through FDGS' AuthentiCare mobile application, offering flexibility for continuous collection of visit information in rural Arkansas locations that may not have cellular connectivity. The mobile app has two modes for connectivity for caregivers: Standard and Frontier. Frontier mode overcomes connectivity issues found in rural areas. Workers use the mode that best fits the connectivity options in their area.

Self-directing Employees install the free mobile app on their own phone or tablet and use it to check in and check out when providing care. Sample screen shots are included in **Figure 49** below. The system uses the device's network time and GPS location to verify the start and end times of the visit and the location of service in real-time. Visit information is stored on the device until the worker has Wi-Fi or cellular data coverage, and then the data are automatically uploaded, providing a paperless solution.

In limited-service areas, the AuthentiCare mobile application provides Store and Forward technology features. In contrast to other vendors, the AuthentiCare Store and Forward solution uses the mobile device's network time and GPS location services for EVV, rendering a fixed device unnecessary. Even in the limited-service areas, GPS location will be captured so service location is validated.

Figure 49: Sample Mobile Check In / Check Out Screens
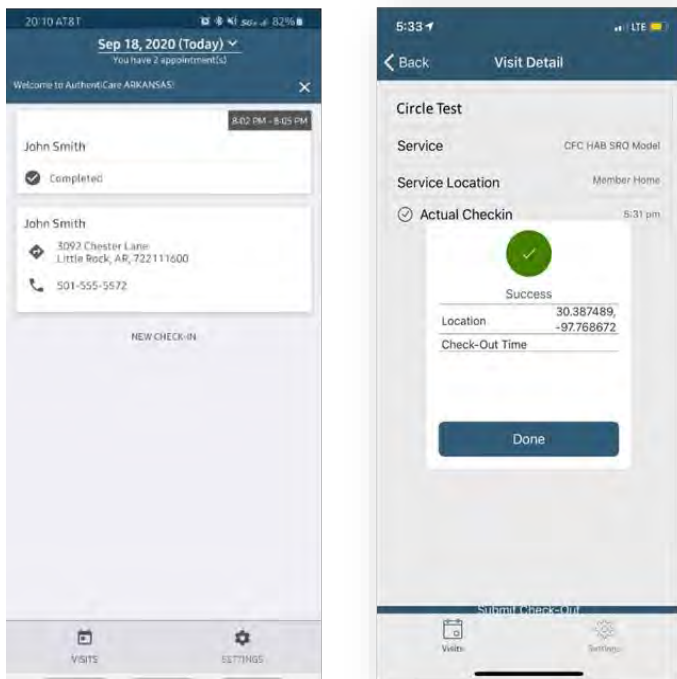
For this opportunity, Palco will remain in compliance with the requirements set forth in RFP 710-22-0018 by maintaining our successful and productive integration with FDGS' EVV solution, **AuthentiCare.** See **Figure 50** to confirm our declaration to continue using the state sponsored EVV solution, AuthentiCare.

Figure 50: Palco's Third Party EVV System Declaration Form

DocuSign Envelope ID: 30B2FE44-C928-43D2-B1F2-28996C3A8113

Arkansas Third-Party EVV System Declaration Form

This form is to be completed and signed by agencies. This will enable us to identify whether you will be using the State-sponsored EVV solution, AuthentiCare, or using a Third-Party EVV solution. If you use a Third-Party EVV solution it must be approved by the Arkansas Department of Human Services (DHS), and must comply with the list of requirements that can be found here https://medicaid.mmis.arkansas.gov/general/programs/EvvInfo.aspx.

Please submit the completed form, along with any questions you may have, to: ARthirdpartyevv@dhs.arkansas.gov

1. Who is completing this form?

   Name: Alicia Paladino   Title: CEO

2. Please fill in your agency information:

Agency Name	Palco, Inc
Agency Medicaid ID	201541787, 156234787
Agency Contact Person Name	Alicia Paladino
Agency Contact Person Phone	501.604.9936, ext 1215
Agency Contact Person Email	alicia@palcofirst.com
Agency Street Address 1	17300 Chenal Parkway, Suite 300
Agency Street Address 2	
Agency City	Little Rock
Agency State	AR
Agency Zip Code	72223

3. Please fill in your EVV solution vendor selection and information:

   [X] I will be using the State Sponsored EVV Solution, AuthentiCare.

   [ ] I will be using a Third Party EVV solution and will complete the box below:

Name of Vendor/Company	
Name of EVV solution	
Vendor Contact Person Name	
Vendor Contact Person Phone	
Vendor Contact Person Email	

[X] I agree that the information I have provided is accurate and that I will comply with the State of Arkansas Third-Party EVV requirements.

Name: Alicia Paladino   Email Address: alicia@palcofirst.com

Date: 5/20/2022

Signature: *Alicia Paladino*

E.13.B. Hosting Environment for Palco Products/Software

Technology is the core of Palco's ability to deliver. We have spent the last decade developing transformative open-frame software to fill critical access to information gaps in the self-directed environment. Implementing a multi-layer technology platform architecture provides numerous technological as well as business related advantages. But, as with all changes, it requires a change in mindset of the application developers to fully exploit its advantages. We approached our tech stack with a question we asked in every phase, "how do we build a tech stack that does not slow you down and lock you in?" It starts with choosing a flexible system of technologies that are swapped in and out as your business grows and your requirements change. Palco's developers have seized the mindset to create a forward-looking technology stack to remain stable into the future.

It is important for FMS agencies to be able to pivot and respond to change quickly. Palco's IT (Information Technology) department executes Agile Project Management to increase team performance, improve customer satisfaction, and increase project versatility. Additionally, we have used LEAN process improvement methodologies to continuously improve our processes and our Case Management Portal (CMP) to create a structure that is easily adapted to meet any program demand. This is evident by the diverse programs that we support with different funding streams, unit types, business rules, and client requirements that differ from state to state, managed care organizations, and program to program.

Frequently, if not always, we work in a complex environment that includes multiple vendors and integration points. Adapting technology to streamline all the information into one usable tool has been our goal. Our Cloud-Based CMP has been developed and enhanced by years of seeking solutions to the challenge's states and MCOs have with accessing real-time program-related data. Our development methodology is based upon best practices, and we feel, more importantly, it is informed by on-the-ground experience from working successfully with state agencies, managed care organizations, and other community stakeholders.

React JS is a JavaScript library built and maintained by Facebook. React is an efficient and flexible JavaScript library for building simple, fast, and scalable web applications. The traditional DOM (document object model) is tree-structured and even small changes at the upper layer causes severe performance degradation for the user interface. To solve this issue, the Facebook development team created the Virtual DOM kept in memory and synced with the "real" DOM by a library such as ReactDOM. Using the virtual DOM dramatically guarantees better user experience and extremely fast performance. React is used by many top companies and organizations including Apple, Netflix, PayPal, Airbnb, Tesla, Walmart, NASA, BBC, Lyft, and New York Times to name a few.

WEB/APP SERVER: NGINX

Nginx is software for web serving, reverse proxying, caching, load balancing, media streaming, and more. Nginx is known for its resource efficiency and responsiveness under heavy load. Nginx scales extremely well with limited resources; memory and CPU usage remain consistent, even under peak loads.

BACK-END APPLICATION LANGUAGE: ELIXIR

Elixir is designed for building massively scalable applications such as telecom and banking systems. Elixir leverages the Erlang VM, known for running low-latency, distributed, and fault-tolerant systems, while also being successfully used in web development. Elixir is capable of handling intense traffic while delivering high performance. It is a functional programming language that is highly testable, ensuring reliable and robust systems where data is protected from alterations or losses. Elixir makes use of Phoenix, a web framework that gives each request its own lightweight process with a low memory footprint to allow thousands of processes to execute quickly with minimal impact on performance. Even when applications are under extreme load, a single slow process cannot hinder the entire system. As a result, Elixir almost guarantees fault-tolerant applications. This is critical for modern web applications to provide a responsive and high-quality experience for all end users. Elixir is used in heavy data processing companies like Netflix and Pinterest.

HOSTING PLATFORM: GOOGLE CLOUD

Google Cloud Platform (GCP) offers a wide array of cloud computing services, running on the same infrastructure that Google uses to power its Search, Maps, and YouTube. It includes services like computing, storage, networking, data analytics, and artificial intelligence (AI), which, along with embedded management tools, will be used to develop, test, and deploy new applications and features quickly.

Google Cloud's infrastructure was built to serve billions of users who rely on several Google services every day. Google Cloud makes this same world class infrastructure available to its customers so that they have the same reliability, security, performance, and scalability in their applications.

CLOUD-NATIVE MODERN ARCHITECTURE

Palco applications were designed and built from the ground up for the cloud. In a cloud-native model, applications are containerized to decouple the binaries from the underlying host operating system and make applications design, development, and deployment extremely scalable, reliable, and fast. Containers are scaled to handle increased load automatically and seamlessly. Within a cloud-native application, workloads are containerized for stronger isolation and tighter security. Palco applications have been organized into separate frontend and backend containers to be independently deployed, managed, and scaled. Our applications are designed as a set of loosely coupled, independent services to increase flexibility and extensibility. **See Figure 51** system flow chart below.

Figure 51: System Flow Chart
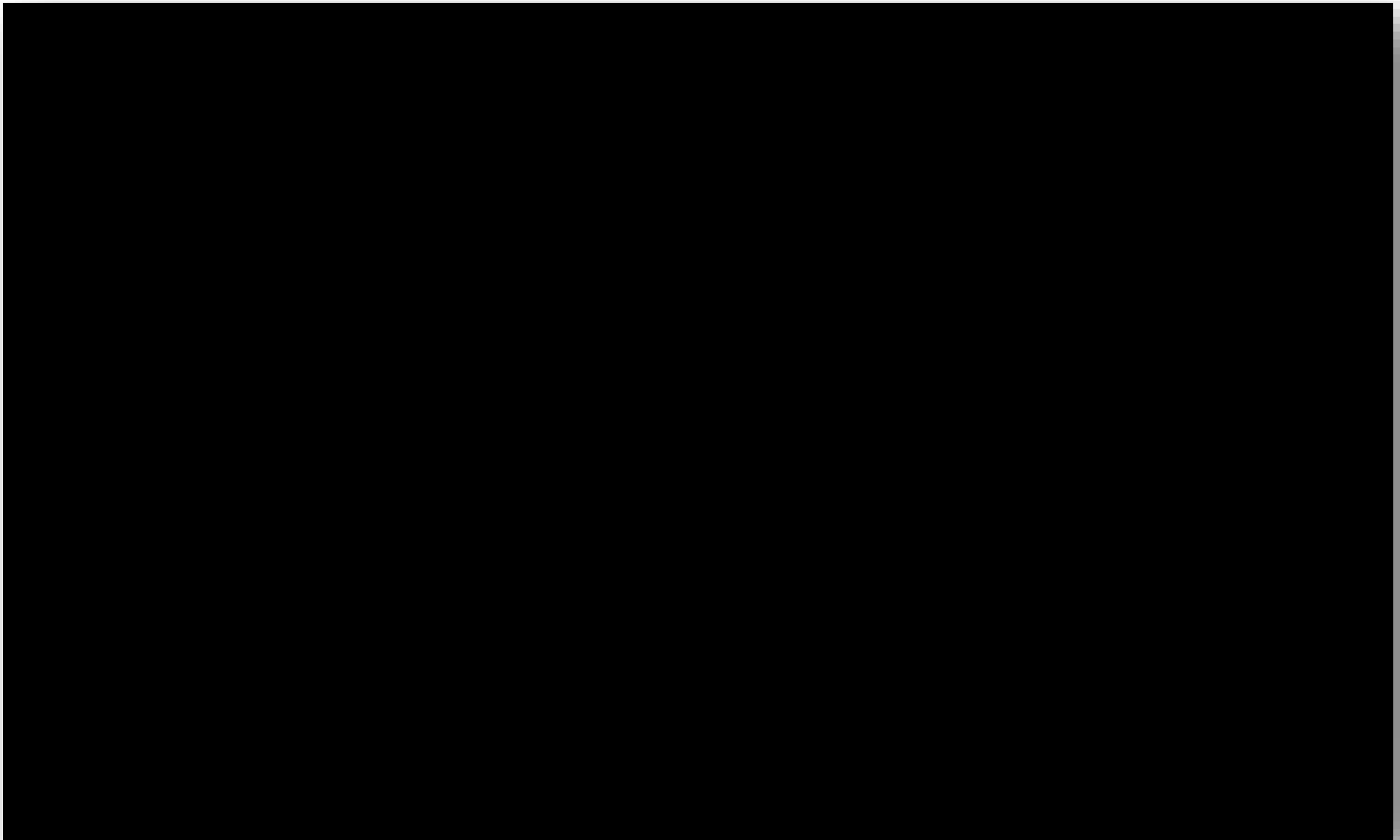
JENKINS

Jenkins is an open-source automation tool written in Java with plugins built for Continuous Integration purposes. Jenkins is used to build and test software projects continuously making it easy to integrate and extend application features.

Palco uses Jenkins to manage the build and deployment pipelines. Jenkins invokes a series of tests on each build, creates a Docker container image for each of them, pushes them to the Container Registry, and finally notifies Kubernetes to replace the current running app with this new build.

CLOUD SQL DATABASE

Palco applications run against a MySQL database hosted in GCP. It is a high-availability database with replication between multiple zones in GCP with automatic failover ensuring 99.99% uptime. GCP provides automated and on-demand backups, and point-in-time data recovery. As storage needs expand, GCP automatically expands the database size to accommodate additional storage needs. Palco easily scales the database CPU and memory as load increases, with no down time.

SCALABILITY: ADJUSTING CAPACITY TO MEET DEMAND

GKE clusters integrate with autoscalers that let Palco grow resources based on consumption metrics.

Palco has horizontal autoscaling enabled for the production cluster. In Kubernetes, we run a minimum of two containers for each of our front-end and back-end applications. Kubernetes automatically increases the number of containers according to CPU and memory usage. In addition, we have vertical autoscaling enabled to run containers on more performant instances if necessary.

GCP includes a performance dashboard to monitor the general health of the production system. This dashboard provides metrics across all applications and databases to enable us to make data-driven scaling decisions. The dashboard provides details to monitor CPU utilization, storage usage, memory usage, read/write operations, SQL queries, and active connections.

HIGH AVAILABILITY AND RESILIENCE

A resilient and universally available app is one that continues to function despite failures of any of its components. Building such an application requires extensive automation, which we have done. We have automated our infrastructure provisioning, testing, and application deployments to deliver consistency, speed, and to minimize human error. We treat our infrastructure as code (IaC), which is a technique to treat infrastructure, provisioning, and configuration in the same way as application code. Our provisioning and configuration logic is stored in source control so that it is discoverable and can be versioned and audited. Because it is housed in a code repository, we take advantage of continuous integration and continuous deployment (CI/CD) pipelines, so that any changes to our configuration are automatically tested and deployed.

Palco applications are built on a highly available architecture and platform to maximize service availability achieved through redundantly deploying components through all application tiers. Our infrastructure provides us a range of load-balancing options to manage application traffic. We have load balancing configured for both our frontend and backend applications to distribute traffic across multiple redundant containers.

The Palco system automatically monitors the health of each containerized application using liveliness and health check probes. If certain resources appear unhealthy, the system directs traffic elsewhere. These probes enable the Kubernetes orchestrator to auto heal any unhealthy containers. For these reasons, Palco applications have 99.99% availability with zero downtime releases and deployments.

E.13.C. EVV System Security Measures

In using the state sponsored EVV solution, AuthentiCare, Palco is able to ensure that the security measures and safeguards built within the EVV infrastructure are compliant with the 21st Century Cures Act and is delivered as a Software-as-a-Service (SaaS) model.

Palco and FDGS use the following means to secure the user's device and software solutions:

- ✔ Data noted above is encrypted while stored on the device
- ✔ Access to stored data is available only with the worker's username and password
- ✔ Caregivers are authenticated into the app with username and password (something you know) and a device ID on file with AuthentiCare (something you have).
- ✔ This multi factor authentication is required at least daily and each time the caregiver logs out or shuts down the app.
- ✔ The app locks after 15 minutes of non-use
- ✔ Username and password are required to access after timeout locking
- ✔ After the phone is locked, username and password are required to access the app
- ✔ NIST based password policies are in place

The AuthentiCare EVV solution complies with Section 12006(a) of the 21st Century Cures Act. With configuration of our existing AuthentiCare EVV solution, FDGS supports Personal Care Services (PCS) and Home Health Care Services (HHCS) according to Arkansas's EVV program policies and its waivers.

AuthentiCare includes location and date/time capture that is automatically flagged if missing or manually changed. Integrity checks are built into AuthentiCare and available in standard reports and dashboards for monitoring and research. By having all EVV data in one place, the State has greater visibility and oversight of its programs, further enhancing its ability to detect and prevent fraud, waste and abuse.

In developing a cloud-native architecture, it was important to Palco to concurrently strengthen security, so we deployed the following security principles.

- ✔ **Protection of network at the edge**, so that workloads are isolated from network attacks and unauthorized traffic from the Internet. Although a wall-based approach is not a concept new to cloud-native, it remains a security best practice. In a cloud-native world, a perimeter approach is used to protect as much infrastructure as possible against unauthorized traffic and potential attacks from the Internet, for example, volume-based Denial of Service attacks.
- ✔ **No inherent mutual trust between services**, so that only known, trusted, and specifically authorized callers can utilize a service. This stops attackers from using untrusted code to access a service. If a service does get compromised, it prevents the attacker from performing actions that allow them to expand their reach. This mutual distrust helps to limit the blast radius of a compromise. Trusted machines running code with known provenance, so that service identities are constrained to use only authorized code and configurations, and run only in authorized, verified environments.
- ✔ **Choke points for consistent policy enforcement across services**. For example, a choke point to verify requests for access to user data, such that a service's access is derived from a validated request from an authorized end user, and an administrator's access requires business justification.

✔ **Simple, automated, and standardized change rollout**, so that infrastructure changes are easily reviewed for their impact on security, and security patches are rolled out with little impact on production. Isolation between workloads sharing an operating system, so that if a service is compromised, it can't affect the security of another workload running on the same host. This limits the "blast radius" of a potential compromise.

ENCRYPTION/SECURITY

We use several layers of encryption to protect customer data at rest. All data is encrypted at rest and in flight, using one or more encryption mechanisms. Data for storage is split into chunks, and each chunk is encrypted with a unique data encryption key. These data encryption keys are stored with the data, encrypted with ("wrapped" by) key encryption keys that are exclusively stored and used inside Google's central Key Management Service, which is both redundant and globally distributed. All data is encrypted at the storage level using AES256. We use a common cryptographic library that incorporates the FIPS 140-2 validated module, Boring Crypto, to implement encryption consistently across all Palco products.

ENCRYPTION OF BACKUPS

Our backup system ensures that data remains encrypted throughout the backup process. This approach avoids unnecessarily exposing plaintext data. In addition, the backup system further encrypts each backup file independently with its own data encryption key (DEK), derived from a key stored in Google's Key Management Service (KMS) plus a randomly generated per-file seed at backup time. Another DEK is used for all metadata in backups, which is also stored in Google's KMS.

E.13.D. Meeting the Needs of Arkansas Self-Direction Program

During the implementation of EVV for the Arkansas self-direction program in Spring of 2021, Palco presented solutions to assist DHS program staff with tailoring the EVV system design to meet the needs of self-direction program participants. EVV systems are typically designed through the lens of home care provider agencies and facilities, making utilization for a self-direction program challenging. The Palco solution, which integrates seamlessly with AuthentiCare, the state's chosen EVV solution, provides self-directing stakeholders with a user interface that is built with self-direction in mind.

During the height of the COVID pandemic, we partnered closely with the Arkansas Department of Human Services and FDGS to transition 2,842 program Participants/Representatives and 3,559 self-directing Employees to a service delivery model that included Electronic Visit Verification in order to secure DHS compliance with a federal mandate. As part of this transition, Palco's dedicated training team and Counseling field-staff led the EVV implementation training efforts by providing virtual, instructor-led group training opportunities for stakeholders. In addition, our Counseling field staff, and Customer Support staff participated in hundreds, if not thousands, of individual support calls with program participants during this transition to EVV.

Implementing EVV with a self-direction population requires patience, intensive training efforts, and exemplary customer support. Our Customer Support Center fielded 50,737 calls over the course of six

months, helping to ease anxiety and the fear of change experienced by many participants and their employees. Our collective efforts alongside DHS staff enabled the State to implement EVV as seamlessly as possible.

As outlined in **Figure 52** below, the process begins with the Employee capturing time using the State chosen EVV solution, AuthentiCare. Through Palco's custom application programming interfaces (APIs), time entry data is imported into the Palco Connect system which serves as the main user interface for all time management and submissions completed by the self-directing Employers and Employees.

Figure 52: Palco EVV to Payroll Process Flow
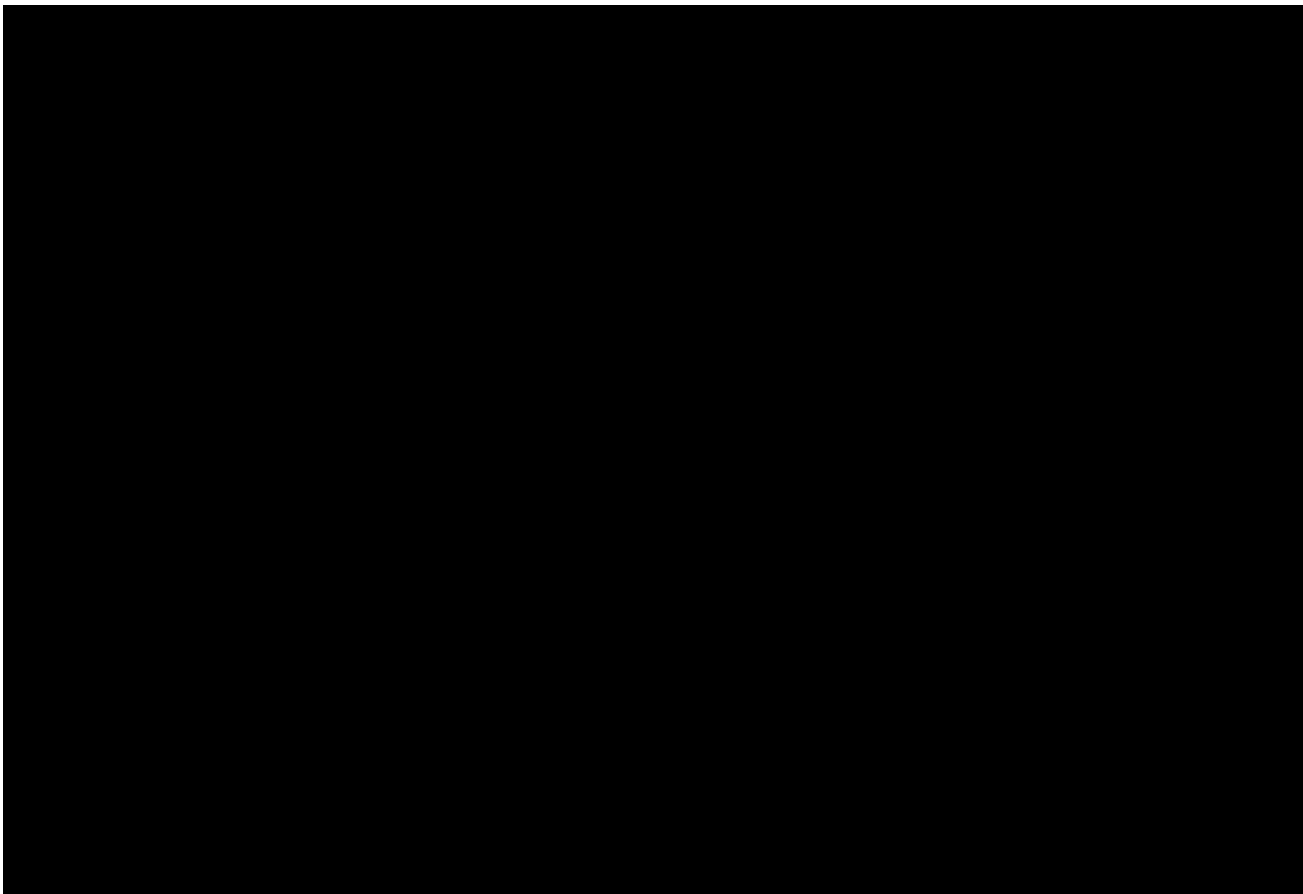
OVERCOMING EVV AND TECHNOLOGY CHALLENGES

With low computer literacy rates in our state, our Counselors often encounter individuals that are anxious or uncomfortable with technology. There are also pockets of the state that report a lack of access to fast, reliable internet service, and the populations impacted are not just those in rural parts of the state. This presents inherent challenges when implementing a technology-focused initiative like EVV.

During the initial EVV implementation, DHS implemented a process flow that required the Employer to utilize the FDGS online portal for management and approval of claims. To a home care agency or

business professional, this is typically a manageable task. However, it presented challenges to the self-directing stakeholders who do not possess the same background and business savvy of a traditional Medicaid provider. During the first several weeks of the EVV implementation in spring of 2021, payroll volume decreased dramatically due to users struggling to navigate the tools and being able to submit their time.

In May 2021, three months after the initial implementation, DHS made the decision to pivot to the Palco Connect solution. This provided stakeholders with a revised platform to meet program expectations that was user friendly and easy to navigate. Rather than accessing the online claims portal, Participants/Representatives and their Employees were able to view, manage, and approve their time in Palco Connect. Palco Connect is built with self-direction in mind. This change proved to be a turning point in the successful implementation of EVV in Arkansas for the self-direction program.

Beginning with the pay period in late May 2021, Palco observed a significant increase in payroll volume with this new solution in place. Payroll volume continued to increase each week as users became more comfortable with the new solution and received one-on-one support from their Palco Counselor. Palco ran continuous off-cycle payrolls during this time to get money into the hands of the hardworking caregivers as fast as possible. Within 60 days of the Palco solution being fully operational, payroll volume returned to its normal level and paper timesheet usage was nearly eliminated making the State of Arkansas fully compliant with the 21st Century Cures Act for self-direction.

One critical lesson learned and felt by both DHS, Palco, and FDGS leadership during this EVV implementation was that the self-direction stakeholders, including program Participants/Representatives and their Employees, require a hands-on, in-person approach to training and outreach. Relying on trusted relationships honed over years of serving their local communities, Palco Counselors provide individualized one-on-one training and outreach with program Participants/Representatives to introduce and transition this population to the state's chosen EVV solution. Throughout the state's EVV implementation, having local staff readily available in both our Little Rock-based office and throughout the state provided the type of personalized accessibility that made a difficult transition a successful one.

For individuals with known hardships, we patch into the IVR EVV system to capture the required EVV data points and generate timesheets for hours worked. This EVV alternative relies on the participant's landline phone to capture participant name, caregiver name, clock in/clock out, services provided, etc. Some states also implement program policies that allow for EVV exemptions to address specific technology challenges and hardships. While Arkansas does not currently recognize EVV exemptions, we do have experience implementing a process to track these EVV exemptions at a programmatic level and providing that data to external users in real-time via our Case Management Portal (CMP).

OUTCOMES BASED CERTIFICATION (OBC)

Through our partnership with FDGS in New Mexico, we are currently collaborating on developing evidentiary packets for CMS EVV Outcomes-Based Certification. Palco has been an engaging partner with the FDGS Certification Team throughout the last 8 months as we prepare for the CMS Operational Readiness Review (ORR) and final Certification Review (CR). New Mexico is taking an accelerated approach, choosing to do both the ORR and CR simultaneously creating a compressed timeline for all stakeholders. Palco has drafted or partially drafted many of the evidentiary packets required by the CMS EVV Intake form. We look forward to continuing this partnership with FDGS and DHS as the State of Arkansas plans for their own EVV Certification.

Our experience working with FDGS and CMS in another state, gives us confidence that we will serve in a meaningful and supporting role as Arkansas engages in CMS Outcomes Based Certification (OBC) activities. Our Subject Matter Experts have been engaged with FDGS through the finalization and implementation of the new EVV OBC process, gaining insight and receiving clarification on the process timing, expectations on the third-party audits, and feedback on the OBC Key Performance Indicators (KPIs). Palco will even be responsible for producing a portion of the KPI reports for the self-direction program in New Mexico, alongside FDGS.

CMS Certification is not just a one-time event. The EVV OBC approach requires a State Medicaid department to report quarterly on Key Performance Indicators (KPIs) and provide an annual report for accessibility, privacy, and security assessments and KPIs. The assessments and reporting will be mandatory for DHS to continue receiving enhanced funding through Maintenance and Operations. With Palco and FDGS' approach and capabilities, DHS can be confident that our approach will meet the federal requirements for certification and the ongoing compliance for M&O enhanced federal funding.

Palco passionately believes the unique integrations developed in partnership with FDGS are the key to meeting the complexity and unique needs of a self-directed service delivery model required to comply with the 21st Century Cures Act. This kind of solution cannot be found with other FMS vendors.

"This program has allowed my caregiver to stay at home with me and still get paid. I am able to be taken care of by my loved one instead of having to go through an agency or go to a rehab facility. I am able to be comfortable with my caregiver and that makes my life so much better. If it was not for the Palco program, I would not be able to live as normal. I am appreciative we found this program and company."

-John R. from Arkansas (Used with permission)

E.13.E. EVV User Account Management

Currently, Palco uses an application programming interface (API) to send and receive EVV data from multiple vendors in Arkansas as well as other states/programs. In Arkansas, a few unique data feeds are utilized to generate and manage user access to the system. As the self-directing Employee is assigned a Provider Identification Number (PIN) by the State of Arkansas, that PIN is housed within the Arkansas MMIS (managed by Gainwell) and fed to AuthentiCare (managed by FDGS). Palco also houses this PIN for every self-directing Employee within the Palco Case Management Portal (CMP) and utilizes it as a synchronization point between AuthentiCare and Palco CMP.

Several APIs work together to create user system access. Those feeds include:

- ✔ **Authorization Feed** which ties the Participant, Employee, and the services the Employee is authorized to provide together. It also ties the self-directing Employee to the Palco provider account.
- ✔ **Employer Feed** which ties the Participant and Employee to the self-directing Employer. This feed also ties the Employer to the Palco provider account.

Figure 53 below illustrates the three (3) step process utilized for establishing user access and associating relationships done within AuthentiCare by the various Palco APIs.

Figure 53: Arkansas EVV Workflow for user account access and creation

Palco has the capability to integrate with any external system or application, using a Job Queue application that runs backend jobs on demand or on a set schedule. For example, to meet the demands of the 21st Century Cures Act, Palco integrated with the state's chosen EVV vendor (FDGS) for Employee time entry. Palco worked closely with FDGS and DHS to ensure a successful EVV integration in Arkansas.

Should the need arise, we will build customized jobs, including APIs, to integrate with external systems via various data transmission protocols such as SFTP, web services APIs, and REST APIs.

We have a successful history of technology integration and the cohesion of supporting architectures with DHS as well as other states and managed care organizations. In every instance, Palco has a functioning team and resources in place that are well-versed and committed to successfully meeting applicable DHS and CMS standards.

The Palco Connect system serves as a single interface for the Participant/Representative and their Employee(s) for capturing EVV timesheet edits, manual timesheet entries, and review and approval as well as other important datapoints to help them manage their self-directed services.

To protect our data, the following controls are in place:

✔ **Access to data, application, and system functions by users and support personnel.** All individual user access to the participant and provider portal is authenticated and authorized based on criteria such as role(s), programs, or individual claims.

✔ **Issuance, management, and maintenance of unique UserIDs and passwords.** External users are required to provide a valid email address during the enrollment process, which acts as the UserID. They are also required to provide a strong password that gives them access to only their personal information. Users have the ability to change their UserID or password through each of the web services they may have access to. For security, accounts may become inoperable after a period of inactivity or be inactivated as part of an internal workflow process. All passwords are b-crypt hashed at the application level before being transmitted to the authentication database.

✔ **Formal user registration and de-registration for granting and revoking access to information systems and services.** Once a new user is established in the system, a registration email is sent with a uniquely generated PIN and link to the registration page. The user uses the PIN, last four digits of their SSN, and last name to begin portal registration. An email confirmation is sent with a link to complete registration and enable system access. The user management portal may be used to manually activate or de-activate accounts. De-activation may also occur as part of an automated internal workflow or by the user wishing to close the account. Time-limited read-only system access is maintained in some instances to provide access to historical records and tax forms.

✔ **Mechanism for restricting and controlling access and privileges to only authorized functionality and/or services.** Accounts are created with specific roles or combination of roles and access claims.

- **Locking user accounts upon multiple failed login attempts.** Accounts are locked after four failed log-in attempts for a period of 15 minutes. Additionally, log-in attempts are rate limited to prevent brute force attacks. Audit logs are maintained detailing all log-in activity.

- **Password reset validations.** Forgotten passwords are reset via the password recovery process. The account UserID is entered, an email is issued, and the user follows a link to the change password screen via a time-limited encrypted token. We require strong password requirements for security with multiple character types and length definitions.

All system access is monitored and written to audit logs. Email alerts are dispatched to support staff upon certain security events, such as account lockouts. All user generated database transactions are logged to audit tables.

E.13.F. Integration with EVV Aggregator(s)

Palco has an established and strong partnership with FDGS. We have successfully utilized and integrated with AuthentiCare, the state's chosen EVV solution, for the last five years.

- At this point in time, Palco will not need to utilize FDGS as an EVV aggregator since we are already patched into their system and successful exchanging data with AuthentiCare.

However, we have worked closely with an EVV aggregator in Colorado and Pennsylvania to integrate our EVV and billing software to process EVV claims. We have built an application programming interface (API) to share data with the EVV aggregator in those states. If needed, we could leverage this knowledge and expertise in Arkansas too.

E.14. Quality Control

Our quality control measures continue to exceed the state's expectations as outlined in the RFP Scope of Work. Our approach to satisfaction surveys is described on pages 218-219. We outline our approach for reviewing services prior to payment beginning on page 219, while our proactive strategies to identify unusual activity are described on page 220. Our approach to ensure timely and accurate payroll is described on pages 220-223, while our methods for detecting quality concerns and tracking and monitoring customer support are outlined beginning on page 223.

Our Quality Management Plan engages industry-standard tools to address quality assurance and improve upon quality initiatives. Self-direction Programs are based on the philosophy that individuals have the right and the ability to direct the process for assessing their needs, deciding how these needs will best be met, and evaluating the quality of the services they receive. The person-centered planning process ensures that the individual service plan addresses the participant's identified needs and goals, and thus becomes the "roadmap" for delivering, managing, and monitoring services.

Thus, quality activities ensure that services are being delivered in accordance with individual's cash expenditure plan, which includes continual audit of program funds and feedback from Beneficiaries regarding the services we provide.

Continual Audit of Program Funds. Each time a payroll is done, money received for payment of funds is reconciled to money paid out. In addition, each month, the bank statement is reconciled to CMP. Regular reconciling of all funding is critical to ensure that internal controls are performing properly, no fraudulent transactions have occurred, and individuals are using their budgets appropriately.

Feedback from Beneficiaries. Quality means that Program goals are being met, that services and supports are accessible and available to the Program participant, outcomes are positive, and the safety and well-being of each Program participant is safeguarded. Program Beneficiaries play a significant role in reporting and evaluation quality through satisfaction surveys and through a complaint system. This allows managers to know how well our services are being performed. It also opens the door to discovering creative solutions. Surveys and complaints or other feedback will be stored electronically. Data analysis tools will retrieve patterns in the surveys, which will be used by managers to make decisions about the quality of services being provided.

For financial fraud and abuse issues, Palco, Inc. acts as mandatory reporter to the appropriate State agency. Our system is designed with a multitude of controls in place to ascertain quality for individuals enrolled on this Program and their worker. Fraud is a crime and abuse violate other applicable laws and administrative rules. Both undermine the integrity of the Program. Any serious or repeated grievances by a participant or a participant's employee that informs that the participant is not receiving services from their employee, the participant is being coerced by their employee or by a friend or family member regarding their Program participation, or the participant or their employee received a payroll or end of the month check not belonging to them is reported within 24 business hours to the Program administrators.

Arkansas Employers must report re-hires, or employees who return to work after being laid off, furloughed, separated, granted a leave without pay, or terminated from employment for 60 days or more. Employers must also report any employee who remains on the payroll during a break in service or gap in pay, and then returns to work. A rehired employee includes any individual who has been separated from employment for 60 consecutive days.

E.14.A. Measuring Stakeholder Satisfaction

Palco continues to work alongside DHS program staff to perfect and administer annual satisfaction surveys to all program stakeholders. Surveys are distributed annually by January 31 to employers enrolled the preceding year and results are sent to DHS Program Staff by April 30 of the same year. Our quality assurance system engages the customer, which is why we place particular care on annual satisfaction surveys and incorporate any recommendations made by users of our service. Each task in our Arkansas Operational Policy and Procedure Manual has related internal controls, quality indicators, performance metrics, and methods for monitoring these indicators and metrics.

We will collect information on the following topics for the annual satisfaction survey:

- Satisfaction with employer orientation and skills training, and any annual training(s).
- Satisfaction with Palco Counselor (Support Coordinator) interactions.
- Satisfaction with tools/resources provided by the Palco Counselor.
- Satisfaction with Employer responsibilities, including first payroll.
- Confidence in Employer roles and responsibilities; and
- Any additional comments/requests for additional training or support.

Internal controls cover all areas of operations, including monitoring caregiver eligibility and status, employer employment practices, tracking participant's budget funds, verifying accuracy of timesheets, ensuring payroll accuracy, monitoring billing and claims submissions, and preventing, detecting, and reporting known or suspected fraud and abuse.

POST-ENROLLMENT FOLLOW UP

In addition to the wide-view annual satisfaction survey mentioned above, Palco will complete an additional measure of quality assurance to verify that all stakeholder needs are being met following a new Participant/Authorized Representatives first successful payroll in the self-directed program. As explained in our staffing plan outlined in Section E.2.B, every Palco Counselor is a part of a regionally based team supervised by a Regional Manager who provides oversight and support for all day-to-day operations. The Palco Regional Manager assigned to the Participant/Representative will complete outreach and follow up to verify that initial enrollment and training went well. During this call, the Regional Manager will discuss the following topics to gage Participant/Representative satisfaction:

- How did the first payroll and pay period using EVV go?
- Did the Employer/Caregivers have the resources and tools they needed to be successful?

- ﹀ Which resources were most helpful?
- ﹀ Do they know where/how they can ask questions and seek support if necessary?

To conclude the call, the Palco Regional Manager will ask the Participant/Representative if they are willing to complete a satisfaction survey regarding the enrollment process and their overall experience starting self-directed services. The survey will be administered over the phone with the Palco Regional Manager dictating, via an electronic copy of the survey being emailed, or via a paper copy of the survey being mailed. A draft copy of the **Post Training Evaluation Survey** can be found in **Appendix 7**. The results of this survey will be compiled by Palco and provided to the DHS program staff as part of quarterly reporting.

E.14.B. Reviewing Services Prior to Payment

Palco's approach to EVV includes working with the state's chosen EVV solution, AuthentiCare, which is fully integrated with the Palco Connect portal ensuring the two systems (AuthentiCare and Connect) work seamlessly so there is never confusion on where actions need to take place.

Once information related to timesheets is in our system and verified via EVV, the payroll process is initiated.

Timesheet data are compared to budgets, checking for errors and individual budget compliance issues upon submission. Exception Reports itemize discrepancies, such as timesheet reporting for individuals who have an inactive status or timesheet hours that exceed budget-authorized hours. Palco management staff, composed mostly of CPAs, review these reports carefully to determine the appropriate action to be taken for each instance. All issues are communicated to the Participant/Representative for revision, resubmission, and prompt payment of Employees.

Our system has proven to be effective in tracking and responding to occurrences of payment request over-billing and payment requests that cannot be paid due to missing or erroneous information. All issues are communicated to the employer with sufficient time for revision, resubmission, and prompt payment.

We provide online tutorials, training materials for users, and call center support for providing real-time assistance to electronic users. Our software is embedded with a combination of controls that perform crosschecks and calculations to prevent over-billing. Some examples include a series of variance and exception reports, along with error message displays on timesheet and claim processing tabs in our system. These instant alerts to potential overbilling allow us to remedy the situation promptly.

EXPERIENCE IN OTHER STATES

In other states, we currently receive Prior Authorizations from MMIS daily and upload them into our system - ensuring authorized services are in sync with EVV data. We also establish limits for self-direction budgets by accessing prior authorizations.

CAPABILITY IN ARKANSAS

Palco is prepared to work with DHS staff to formalize a process that allows Palco access to the prior authorization system, giving us the ability to pull down authorized amounts, daily rates, and hours, to ingest into our system. This gives DHS program staff the ability to review the data without having to perform any manual intervention. This information will also be passed to EVV to set up limitations in that system as well.

E.14.C. Proactive Strategies to Identify Unusual Activity

As part of the automated payroll validation process, a series of program specific business rules must be met to render payment for services. Every timesheet circulates through this iterative validation process prior to our payroll team processing and rendering payments. Any validation failures, such as a worker providing overlapping services for multiple participants, is flagged, and held from processing. Automatic notifications are sent to the Participant/Representative via email for review. These notifications alert them to the reason for the validation failure, providing insight on what the Employee needs to do to remedy the problem to ensure a successful payment.

Prior to payroll batching being submitted to our banking institution, the payroll file receives an additional quality assurance review by the Palco Payroll Manager and FMS Director to identify any abnormalities that may be present. While extremely unlikely, this additional step allows for the most comprehensive management of program funds and helps ensure the integrity of the payments being issued.

If at any point in the process suspicious timesheet activity is identified or suspected, the Palco Payroll team will notify the Palco Contract/Account Manager who will in turn notify the appropriate DHS program staff for their follow up and review. If an investigation is initiated by DHS or the Arkansas Office of the Medicaid Inspector General, Palco assists with providing documentation and timesheet records to aid in the review.

E.14.D. Ensuring Timely and Accurate Payroll Processing

A primary function of a VF/EA FMS entity is to process payroll for program participants' caregivers in an accurate and timely manner and in accordance with federal, state, and local tax and department of labor wage and hour laws. The payroll function begins with Electronic Visit Verification (EVV), time submission and processing tasks. Palco has developed and provides caregivers with instructions for using EVV, how to manually enter time, and instructions for time submissions in accordance with Payday Schedule. This information and the process for preparing and submitting caregiver time is covered in orientation and skills training described in Section E.4.B.

ACCURATE PAYROLL PROCESSING

Palco's approach to EVV includes working with the state's chosen EVV solution, AuthentiCare, which is fully integrated with the Palco Connect portal ensuring the two systems (AuthentiCare and Connect) work seamlessly so there is never confusion on where actions need to take place.

Once information related to timesheets is in our system and verified via EVV, the payroll process is initiated.

Timesheet data are compared to budgets, checking for errors and individual budget compliance issues upon submission. Exception Reports itemize discrepancies, such as timesheet reporting for individuals who have an inactive status or timesheet hours that exceed budget-authorized hours. Palco management staff, composed mostly of CPAs, review these reports carefully to determine the appropriate action to be taken for each instance. All issues are communicated to the Participant/Representative for revision, resubmission, and prompt payment of Employees.

Our system has proven to be effective in tracking and responding to occurrences of payment request over-billing and payment requests that cannot be paid due to missing or erroneous information. All issues are communicated to the employer with sufficient time for revision, resubmission, and prompt payment.

Withholding information from the IRS Form W-4 is used to calculate federal and state income tax withholding. Worker residency, relationship with the employer, and live-in status collected during enrollment provides tax exemption and overtime calculation information, in accordance with IRS rules regarding domestic employment, the Department of Labor Home Care Rule, and state employment-related rules. Workers are paid according to the rate set by their employer (which may differ by worker) in compliance with federal and state tax and Department of Labor wage and hour rules for regular and overtime pay.

Voluntary wage deductions are captured at the time of the worker's enrollment, and by request. Our system also captures FIPS codes to ensure taxes are withheld properly.

Palco's payroll software automatically calculates the total payments for worker timesheets, including federal and state withholding and employment-related taxes. Medicare and Social Security tax (FICA), federal income tax (FIT), and state income tax (SIT) are withheld from workers' paychecks each time a payroll is generated. SIT is calculated at the applicable Arkansas income tax rate.

Some workers who provide domestic services may be exempt from certain taxes depending on their familial relationship with the employer (see IRS Publication 15 and IRS Revenue Procedure 2013-39 for more details). We collect relationship information during the enrollment process so that we withhold taxes properly.

Palco processes all payments for judgments, garnishments, tax levies, or other related holds on qualified worker pay as required by federal or state governments immediately after payroll is

generated. Palco tracks balances due on garnishments and voluntary deductions. When a garnishment is paid in full or Palco is notified by a third party to terminate a deduction, staff disable the deduction in our accounting information system. All documentation of authorizations to deduct and their terminations are kept in the worker's case file.

Each disbursement is coded to an expense account. Payments are offset against budgeted amounts. Remaining balances, calculated as the difference between budget limits and period spending, are displayed on each individual's account in real time for viewing in the Palco Connect system by Participants/Representatives and in the Palco Case Management Portal (CMP) for our internal support staff and DHS program staff.

We are proud to be the first FMS vendor to transition the self-direction Employee population to a totally paperless payment method, with all payments being made via direct deposit. Immediately after processing, direct deposits are sent to our financial institution. Palco has a documented system, policies and procedures, and internal controls to ensure that employee pay rates and billable rates are accurate, as established by DHS, in accordance with hourly pay and tax rates. We have protocols for Quality Assurance and payroll data testing of all impending pay rate changes.

All payroll and payment methodologies identified above are documented in Palco's Arkansas Operational Policy and Procedure Manual and are monitored through a variety of internal controls. In our many years serving as a VF/EA FMS entity, Palco has never missed nor delayed a payroll.

TIMELY PAYROLL PROCESSING
Palco currently processes payments to Arkansas self-directing Employees biweekly via direct deposit.

For payrolls that fall on a holiday, Palco issues payments a day early, when possible. We also run off-cycle payrolls for various reasons, including worker hardship or DHS or Palco error. In addition, we provide various reports to Palco Counselors and DHS each time payroll is run. Such reports list denied timesheets and payroll information, such as gross and net pay and withholding information.

If a timesheet is submitted after the payroll deadline, individuals are not required to wait until the following pay period to receive funds; "off-cycle" pay is issued prior to the next payday. This helps mitigate financial harm to Arkansas families and keeps individuals in compliance with Department of Labor requirements.

Palco processes thousands of direct deposit payments concurrently with the capability to expand this number without limit.

In cases where payroll checks are lost, stolen, or improperly disbursed, Palco issues a stop payment request within 24 hours. Stop payments are typically effective immediately; in a few cases, it takes up to 24 hours for Palco's banking institution to stop payment on a payroll check. In all cases, payroll checks are reissued on the next off cycle payroll prior to the next payday after receiving confirmation that the

bank has effectively issued a stop payment. A log of these actions is maintained in Palco's general ledger, and appropriate documentation is retained in Palco's payroll files.

In the rare case that direct deposits that are issued improperly, Palco will reverse the funds on the account when possible. If not possible, a payment plan is established with the worker.

E.14.E. Methodology for Analyzing Data

We review all pending activity each time payroll is processed. Through this system, we review activity and ensure that pending timesheets are ultimately resolved quickly, and we prevent payment of incorrect timesheets for most issues.

Once submitted, a notification is sent to the other party (e.g., if the caregiver entered the time initially, the employer would receive the notification, and vice versa) that time is ready for review. At this stage, the user may take a variety of actions. They can approve it, which sends it on to Palco for processing. They may choose to reject the timesheet, which sends a notification to the initiator of the timesheet submission that the timesheet was rejected. Or they may correct the timesheet and resubmit it – in this case, the initiator must log in again to approve the amended timesheet.

As part of the automated payroll validation process, a series of program specific business rules must be met to render payment for services. Every timesheet circulates through this iterative validation process prior to our payroll team processing and rendering payments. Any validation failures, such as a worker providing overlapping services for multiple participants, is flagged, and held from processing. Automatic notifications are sent to the Participant/Representative via email for review. These notifications alert them to the reason for the validation failure, providing insight on what the Employee needs to do to remedy the problem to ensure a successful payment.

Prior to payroll batching being submitted to our banking institution, the payroll file receives an additional quality assurance review by the Palco Payroll Manager and FMS Director to identify any abnormalities that may be present. While extremely unlikely, this additional step allows for the most comprehensive management of program funds and helps ensure the integrity of the payments being issued.

If at any point in the process suspicious timesheet activity is identified or suspected, the Palco Payroll team will notify the Palco Contract/Account Manager who will in turn notify the appropriate DHS program staff for their follow up and review. If an investigation is initiated by DHS or the Arkansas Office of the Medicaid Inspector General, Palco assists with providing documentation and timesheet records to aid in the review.

E.14.F. Tracking and Monitoring Customer Support

Our Palco Customer Support Center tracks all calls received, including complaints, as well as our response through an automated system that combines metrics from GoTo and Microsoft Dynamics

Customer Relationship Management (CRM) tool. Each Customer Support agent is required to document 100% of their call interactions through the CRM. Failing to do so impacts their quality assurance score. This call log records the following: contact notes, who made the call, who received the call, the reason for the call, actions taken, any mandatory reporting that occurred, and thorough documentation of the final resolution.

Our CRM tool is a cloud-based tool that allows communication tracking and reporting including an electronic record to generate a synopsis of all communications and to provide a complete audit trail of communication to and from all parties. With data consolidated in our CRM, it makes it possible to analyze patterns for call drivers and insights into participant needs and wants. With this tool we monitor our Palco Customer Support Center staff's productivity and improve their customer relationships. Additionally, we have the capability for structuring the communication log to include actions taken, escalations, mandated reporting, and the date of final resolution.
Additionally, we have dedicated email boxes for customer support and enrollment to allow for proper tracking and resolution of email communication.

Our internal reports for contract management include all measures of contract performance, including the following:

- 100% of all inbound and outbound calls are documented and maintained in our CRM.
- Fully operational and accessible agents during the timeframe required by the contract.
- 95% of monthly inbound calls are answered within 3 rings or 15 seconds.
- 100% of voicemails, callback requests, and inquiries are returned within one (1) business day.
- Abandoned calls do not include dropped calls.
- Monthly abandoned calls represent 5% or less of incoming calls, regardless of queue placement.
- Call queue wait time does not exceed five (5) minutes, regardless of queue placement.

E.15. Security

Palco continues to exceed the security requirements outlined in the Scope of Work of this RFP. Our approach for preventing unauthorized access to confidential information is described on pages 228-229 while our approach for reestablishing operations following a catastrophe are described beginning on page 229. We affirm our commitment to preventing security and privacy incidents on pages 230-231. Specifications and security standards for the storage and transmission of data are described beginning on page 231, while our Disaster Recovery Plan is briefly described on pages 233-236 and in greater detail in Appendix 12.

Palco has an in-house IT department that is dedicated to making sure our software is safe. Our cloud-native portal, https://connect.palcofirst.com, is secure, as well as HIPAA and WCAG 2.1compliant. For security purposes, it is first segregated from external traffic through a DMZ and further segmented through an additional virtual firewall and DMZ in the cloud. We provide a network diagram that outlines these boundaries and segments, including connections and relationships between WWW/API gateways, Admin (SSH) point of entry, messaging buses, Private Subnet, and our Palco network.

Our endpoint security system helps to detect, block, and remediate advanced malware and other forms of the most advanced attacks. Our security software is updated in real time, and we run periodic reports to be aware of any infections that have been detected and removed. We re-image our machines periodically so that no machine that has been attacked will remain vulnerable. We run updates to our servers and workstation. operating systems routinely to receive the latest security patches. Our firewall appliance helps to identify and quarantine outside attackers.

We schedule internal system updates based on the severity of the update. Notification of these updates is dependent on perceived impact of the updates. Most updates occur during exceptionally low traffic periods, or periods where impact would be least perceived, such as on a weekend or holiday. Should our systems require downtime, the Department and other relevant parties are notified by our account manager, and the web portal displays a message for the week leading up to the scheduled downtime. Additionally, our customer support staff is trained to respond to inquiries related to systems updates and downtime. We will notify the Department within one (1) hour when, for any reason, the portal is unavailable to Medicaid Individuals or other users.

Standard low risk/low business impact changes rarely follow a set schedule for release or notification, as they have no noticeable, if any, associated downtown, nor operational or UI impact. Impactful or riskier changes follow a standard release path wherein we schedule and work changes, coordinate QA and regression testing, upon sign-off post notification of release date/time at least one week in advance. Our deployment process is to spin-up new instances in parallel with the new updates, direct new traffic to the new instances, after all sessions close on the old instances, and destroy the old instance. In the event a rollback is necessary, the previous version of the application is re-deployed from the original Docker image contained in Image Registry.

The application APIs are architected into versioned REST endpoints to support internal SOA integrations. Newer development utilizes a pub/sub event messaging system to reduce tight coupling between systems and enhance application scalability, as well as reduce potential impact from supporting systems updates.

To guard against code defects, each application that makes up the case management solution implements unit, behavioral, and integration tests. Rigorous QA and regression testing is performed in advance of any production deployments. Testing is performed on identical network and production server replicas using test data (less some of the production hardened security configurations).

Changes in common functionality are analyzed to determine full impact of the proposed change. Once the changes are implemented and pass QA, the system goes through full regression and integration testing prior to a production release.

Custom functionality changes follow a similar process as above, with the addition that a privately accessible QA instance is created to provide client pre-production access for review and acceptance of changes. All changes then continue through the QA and regression testing process prior to a production release.

Palco, Inc. uses, discloses, and safeguards Protected Health Information (PHI) in compliance with the Privacy and Security Rules under the Health Insurance Portability and Accountability Act (HIPAA) and Health Information Technology for Economic and Clinical Health Act (HITECH) of 2009, as well as state law, rules, and regulations. Disclosure of protected health information by our workforce must comply with the requirements stated in the contract and/or Business Associate Agreement under which Palco received the protected health information.

Palco exceeds industry standards for storing PHI, including copies of timesheets, phone logs, summaries of complaints with resolution noted, documentation related to the withholding, filing, payment of federal and state tax, wages, and year-end tax filings in compliance with federal and state Department of Labor rules and in the form and manner. We are committed to reducing waste and harm to the environment; therefore, we store all participant, worker, and VF/EA FMS files electronically. This ensures that all records are properly maintained for ten (10) years after becoming fully inactive or until the disposition of court hearings, audits, and appeals are complete.

The U.S. Citizenship and Immigration Services (CIS) requires that the USCIS Form I-9, Employment Eligibility Verification and Instructions be retained three (3) years after the employee is hired, or one (1) year after the date the employer or employee terminated employment, whichever is later. Documents are kept either indefinitely or with a destroy date according to IRS, DOL, USCIS and state regulations on document retention. Once a document has been scanned, the original is shredded.

All data is secured at rest and in flight. Data and data submissions are encrypted according to industry standards. No PHI is transmitted through non-HIPAA compliant networks or services. We maintain

strict security protocols for our computer and backup systems, exceeding industry standards for storing and disclosing protected health information. Palco's infrastructure complies with Federal Information Processing Standards 200.[8]

All computers and data servers are secure, contain virus protection, and have installed security patches. Our email is secure. All web-based applications employ security certificates and encryption protection.[9] All hardware is password-protected with essential backups stored at an approved off-site location. Imaging servers are maintained in a physically and environmentally secure atmosphere with power-conditioned spaces, accessible to personnel with appropriate security clearances only. All images are backed up daily and copies are stored offsite in securely locked facilities indefinitely.

For secure and HIPAA and HITECH Act compliant electronic storage and management of individual and employee files, Palco utilizes a digital storage/document management system. Not only is the information stored for legal retention, but it is also used on a daily basis for active, working files and is structured to resemble a basic filing cabinet. Permissions to confidential information are only granted to those who need the information to complete their jobs effectively. Palco staff level of access to protected health information is limited to what is minimally necessary to perform assigned duties. The classes and categories of protected health information to which staff can access are based on workforce classification.

As such, access to the system is controlled down to the page level. Once a user logs into the application, the system associates the user with a group that restricts the level of security access rights. Documents and folders are monitored and protected individually, despite user actions. Data is physically separated per contract serviced.

Access to shared data is authenticated and authorized based on criteria such as role(s), programs, or individual claims on a per user level. External users are required to provide a valid email address which acts as the UserID. They are also required to provide a strong password that would give them access to only their personal information. These passwords are b-crypt hashed at the application level before being transmitted to the authentication database. Their account may go inactive after a duration of inactivity or as part of an internal workflow process.

All staff is required to undergo training on HIPAA and MA confidentiality requirements upon hire and annually by our Privacy Officer. personnel also sign a confidentiality agreement. We have a robust HIPAA Privacy and Security Manual. This manual not only covers data and security protocols, but also includes information about disclosure, providing PHI to authorized requesting parties within 15 days of a request, and amending PHI within 30 days of the request.

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[8] FIPS 200 promotes the development, implementation, and operations of secure information systems by establishing levels of due diligence for information security and facilitating a consistent, comparable, and repeatable approach for selecting and specifying security controls for information systems that meet security requirements.

[9] Palco has certified 508 software to comply with federally regulated accessibility. A copy of our most recent Voluntary Product Accessibility Template (VPAT) will be provided upon request.

Staff who know or suspect a privacy or security issue must report it immediately to the Privacy Officer, who will assess the situation and determine the appropriate disciplinary action, which, depending on the severity of the issue, may range from a verbal warning to termination. All issues will be disclosed within one business day, and Palco will implement appropriate and immediate remediation and notification efforts to rectify the situation, including sanctions for the staff or subcontractor responsible, if necessary.

Palco has staff specifically assigned to ensure we are up-to-date and have the latest information pertaining to our scope of work and we remain fully compliant with all applicable state, federal and local rules and regulations. Palco subscribes to several services to possess the most current information, visits key web sites on a regular basis, attends sponsored events, and trainings (webinars) and belongs to several strategic memberships and associations relevant to the key deliverables of VF/EA FMS services.

E.15.A. Preventing Unauthorized Access

Data is encrypted according to industry standards. No PHI is transmitted through non-HIPAA compliant networks or services. We maintain strict security protocols for our computer and backup systems, exceeding industry standards for storing and disclosing protected health information. Palco's infrastructure complies with Federal Information Processing Standards 200.[10] Documentation maintenance and retention follows HIPAA and HITECH. All confidential information is encrypted.

To protect our data, the following controls are in place:

- **Access to data, application, and system functions by users and support personnel.** All individual user access to the participant and provider portal is authenticated and authorized based on criteria such as role(s), programs, or individual claims.

- **Issuance, management, and maintenance of unique UserIDs and passwords.** External users are required to provide a valid email address during the enrollment process, which acts as the UserID. They are also required to provide a strong password that gives them access to only their personal information. Users have the ability to change their UserID or password through each of the web services they may have access to. For security, accounts may become inoperable after a period of inactivity or be inactivated as part of an internal workflow process. All passwords are b-crypt hashed at the application level before being transmitted to the authentication database.

- **Formal user registration and de-registration for granting and revoking access to information systems and services.** Once a new user is established in the system, a registration email is sent with a uniquely generated PIN and link to the registration page. The user uses the PIN, last four digits of their SSN, and last name to begin portal registration. An email confirmation is sent with a link to complete registration and enable system access. The user

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[10] FIPS 200 promotes the development, implementation, and operations of secure information systems by establishing levels of due diligence for information security and facilitating a consistent, comparable, and repeatable approach for selecting and specifying security controls for information systems that meet security requirements.

management portal may be used to manually activate or de-activate accounts. De-activation may also occur as part of an automated internal workflow or by the user wishing to close the account. Time-limited read-only system access is maintained in some instances to provide access to historical records and tax forms.

- ✔ **Mechanism for restricting and controlling access and privileges to only authorized functionality and/or services.** Accounts are created with specific roles or combination of roles and access claims.

- ✔ **Locking user accounts upon multiple failed login attempts.** Accounts are locked after four failed log-in attempts for a period of 15 minutes. Additionally, log-in attempts are rate limited to prevent brute force attacks. Audit logs are maintained detailing all log-in activity.

- ✔ **Password reset validations.** Forgotten passwords will be reset via the password recovery process. The account UserID is entered, an email is issued, and the user follows a link to the change password screen via a time-limited encrypted token. We require strong password requirements for security with multiple character types and length definitions.

All system access is monitored and written to audit logs. Email alerts are dispatched to support staff upon certain security events, such as account lockouts. All user generated database transactions are logged to audit tables.

E.15.B. Reestablishing Operations following a Catastrophe

Palco's detailed Disaster Recovery Plan (DRP), general and ongoing preparedness, and staff training on emergency response ensure that any crisis will have a minimal impact on our operations. Part of our new staff onboarding, and training includes the DRP. We also provide staff with a copy of the DRP and orient them to its provisions. In addition, Palco staff members are cross trained on a variety of tasks. We offer robust instructional materials for carrying out key tasks. If staff members are unavailable, other staff members could readily fill in, and we would bring in temporary staff, who would be rigorously trained to carry out key functions.

At least quarterly, the Palco management team reviews and tests the DRP and makes any necessary updates or revisions. Testing includes walk-throughs, simulations, parallel testing, and full-interruption testing. The Human Resources department distributes and communicates any changes to the plan to the staff.

In the event our DRP is activated, the IT team member performs a variety of tasks to ensure the continuation of critical business processes and the protection and security of the data. This includes the following:

- ✔ Migrating IT operations to an alternate site

- ✔ Installing and implementing any tools, hardware, software, and systems required

- ✔ Ensuring that secondary servers are kept up to date in the standby facility

- ✔ Ensuring that all servers, hardware, software, and other IT tools meet Palco's IT policies

- Ensuring that all essential staff can access the hardware and software that they need to carry our normal operations

Our Communication Specialist will serve as a liaison to Palco staff, affected members, organizations, and state agencies. They will write and distribute information to all parties and the responsibilities and procedures include, but are not limited to:

- Communicating the occurrence of a disaster and its impact to authorities, state agencies, company partners, internal parties, clients, and other interested parties.

- Communicating the occurrence of a disaster and its impact to media contacts, if required.

- Coordinating with the DRP Team Leader and other team members on appropriate messaging, as needed.

- Notifying the relevant parties once the disaster is over and normal business functionality has been restored.

Our dedicated disaster recovery team members include IT staff, human resources, communication, financial operations, and customer service operations. The team is responsible for:

- Understand the magnitude of the disaster.

- Implementing Palco's policies for setting up a temporary call center and other operational departments at a secondary location.

- Training employees on how to carry out essential functions in a secondary facility, as well as on what information to provide parties who inquire about the disaster recovery and Palco's response.

- Executing Palco's communication plan as developed by the communications team and the Primary Team Leader.

Palco's Disaster Recovery Plan and Emergency Preparedness minimizes recovery time and allows us to reestablish operations, systems, and our organization back to business as usual. See **Appendix 12** for the **Palco Disaster Recovery Plan**.

E.15.C. Privacy and Security Incidents

Palco has not had any privacy or security incidents affecting the information of over 10,000 individuals within the past five years. However, we place a strong emphasis on all privacy and security measures. To prevent security breaches or incidents, we take the necessary precautions to make sure all:

- Palco computers and data servers are secure.

- Contain Virus Protection; and

- Install Security Patches.

Our web-based applications employ security certificates and encryption protection, and we utilize secure email, and our hardware is password protected with essential backups stored.

Palco has a documented security breach policy and procedure, and Palco staff are trained to:

- Report the security breach to the Privacy Officer. The Privacy Officer determines if a breach has occurred and needs to be reported to the affected individuals by applying a risk analysis.

- Determine the magnitude of the breach.

- Determine the person who obtained the information has an obligation to protect its confidentiality.

- Determine whether sensitive information was acquired or accessed after conducting a forensic analysis.

- The extent to which the risk has been mitigated, such as by obtaining a signed confidentiality agreement from the recipient.

- Notify all parties that were impacted withing 60 calendar days after discovery.

  o Discovery is calculated from the day when Palco knew or should have known that the breach occurred.

- Send written notification via first class mail to each affected individual (if deceased, individual's next of kin) at the last known address. If the last address is unknown, a phone call is sufficient (or email if the participant has expressly permitted this).

  o Notifications contain the following: what happened, dates of the breach and its discovery, to the extent known; types of unsecured PHI disclosed in the breach (i.e., full name, Social Security Number, date of birth, home address, account number, diagnosis, disability code, etc.); steps participants should take to protect themselves (e.g., contacting their credit card companies); actions taken to investigate the breach, mitigate harm to individuals, and protect against any further breaches; and, contact procedures for individuals to ask questions or learn additional information, including a toll-free number, an e-mail address, website, or postal address.

- If the breach occurs to more than 10 individuals, a posting will be made on our website for at least 90 days. When the breach occurs to more than 500 individuals, notice is provided to major media outlets serving the jurisdiction.

- If an individual calls regarding a breach notification letter, they must speak with the Palco Privacy Officer.

- Whenever an incident is reported, the incident is promptly investigated by the Privacy Officer. If a violation has occurred, notification procedures are engaged, remedial training is conducted, and procedures are implemented to minimize a future incident.

E.15.D. Security Standards for Data Transmission and Storage

Technology is at the core of Palco's ability to deliver. We have spent the last decade developing transformative open-frame software to fill critical access information gaps in the Self-Directed

environment. Implementing a multi-layer technology platform architecture provides numerous technological as well as business related advantages. Palco, along has expanded its expertise to enhance the CMP product suite, now supporting additional federal and state requirements, including HIPAA and HITECH standards and requirements. We also fulfill Federal and State requirements including, but not limited to:

- ✔ NIST 800-53
- ✔ MARS-e
- ✔ FISMA Privacy Act of 1974
- ✔ IRS1075

Palco stores all data, and it is backed up to the Google Cloud Platform (GCP). Cloud based data (GCP) and backup information is stored in data centers and replicated across multiple regions – all inside the United States. We conduct daily backups of our electronic files and data as a localized data backup and restoration method, in case of total failover of all GCP data centers. Backups of internal servers are completed to both on-site storage and off-site cloud storage.

ENCRYPTION/SECURITY

We use several layers of encryption to protect customer data at rest. All data is encrypted at rest and in flight, using one or more encryption mechanisms. Data for storage is split into chunks, and each chunk is encrypted with a unique data encryption key. These data encryption keys are stored with the data, encrypted with ("wrapped" by) key encryption keys that are exclusively stored and used inside Google's central Key Management Service, which is both redundant and globally distributed. All data is encrypted at the storage level using AES256. We use a common cryptographic library that incorporates the FIPS 140-2 validated module, Boring Crypto, to implement encryption consistently across all Palco products.

ENCRYPTION OF BACKUPS

Our backup system ensures that data remains encrypted throughout the backup process. This approach avoids unnecessarily exposing plaintext data. In addition, the backup system further encrypts each backup file independently with its own data encryption key (DEK), derived from a key stored in Google's Key Management Service (KMS) plus a randomly generated per-file seed at backup time. Another DEK is used for all metadata in backups, which is also stored in Google's KMS.

When current software is upgraded, or new software is installed, a backup of any pertinent data is stored at a secure external site outside of a 50-mile radius and inside of a 100-mile radius. Thus, current, and archived files are stored externally in a secure location.

All physical software program disks are stored off-site. Off-site computers are loaded with utilized software. All computers stored off-site are protected by password and other operational integrity mechanisms to ensure proper authorization has been granted for access to computer files. This prevents the loss of information and any interruption in service if a disaster strikes.

Our systems architecture, network diagram and related frameworks are supported by documented IT governance policies. Our IT infrastructure includes a firewall appliance that keeps internal voice and data segregated from external traffic through a demilitarized zone (DMZ). Cloud-based software is further segmented through an additional virtual firewall and DMZ in the cloud.

Palco has established a separate, dedicated standby facility in the event the DRP is activated to ensure the timely return to regular operations without interruption of data and use of appropriate software that is completely up to date as of the previous day's work. The cold site has the capability to meet all Palco's policies, ensuring efficient production of key tasks.

In the event of a regional GCP outage, the entire application ecosystem is scripted and will be manually redeployed to an unaffected region with minimal downtime. Palco has chosen this design strategy so that their application uptime will target 24-hour availability, 7 days a week. Our cloud-based software system is built so that any system maintenance there would have little to no impact on our GCP uptime. Any internal system maintenance that might require downtime would be scheduled during periods of low traffic, such as the weekend or a holiday. Users are notified through in-app message one-week in advance of scheduled maintenance detailing the reason, projected start time and duration.

E.15.E. Disaster Recovery Plan

Palco has a comprehensive **Disaster Recovery Plan** (DRP) for restoring and preventing loss of data, software, master files, and hardware if management systems are disabled. **A copy has been provided as Appendix 12.** Our DRP includes objectives to meet the following provisions:

- ✔ Preventing the loss of the organization's resources, such as hardware, software, data, and other information technology assets.
- ✔ Minimizing downtime related to information technology.
- ✔ Minimizing downtime of the call center.
- ✔ Ensuring continuation of critical business practices in the event of a disaster.
- ✔ Ensuring that a secondary location meets all Palco policies and ensures business continuity.
- ✔ Protecting and securing all data.

Palco has established a separate, dedicated standby facility in the event the DRP is activated to ensure the timely return to regular operations without interruption of data and use of appropriate software that is completely up to date as of the previous day's work. The cold site has the capability to meet all Palco's policies, ensuring efficient production of key tasks.

All data is stored and/or backed up to the Google Cloud Platform (GCP). Cloud based data (CGP) and backup information is stored in data centers and replicated across multiple regions – all inside the United States. We conduct daily tape backups of our electronic files and data as a localized data backup and restoration method (in case of total failover of all GCP data centers). Backups of internal servers are completed to both on-site storage and off-site cloud storage.

When current software is upgraded, or new software is installed, a backup of any pertinent data is stored at a secure external site outside of a 50-mile radius and inside of a 100-mile radius. Thus, current, and archived files are stored externally in a secure location.

All physical software program disks are stored off-site. Off-site computers are loaded with utilized software. All computers stored off-site are protected by password and other operational integrity mechanisms to ensure proper authorization has been granted for access to computer files. This prevents the loss of information and any interruption in service if a disaster strikes.

Our systems architecture, network diagram and related frameworks are supported by documented IT governance policies. Our IT infrastructure includes a firewall appliance that keeps internal voice and data segregated from external traffic through a DMZ. Cloud-based software is further segmented through an additional virtual firewall and DMZ in the cloud.

Palco has established a separate, dedicated standby facility in the event the DRP is activated to ensure the timely return to regular operations without interruption of data and use of appropriate software that is completely up to date as of the previous day's work. The cold site has the capability to meet all Palco's policies, ensuring efficient production of key tasks.

In the event of a regional GCP outage, the entire application ecosystem is scripted and will be manually redeployed to an unaffected region with minimal downtime. Palco has chosen this design strategy so that their application uptime will target 24-hour availability, 7 days a week. Our cloud-based software system is built so that any system maintenance there would have little to no impact on our GCP uptime.

Any internal system maintenance that might require downtime would be scheduled during periods of low traffic, such as the weekend or a holiday. Users are notified through in-app message one-week in advance of scheduled maintenance detailing the reason, projected start time and duration.

- Working with the team leader and other team members to understand the magnitude of the disaster.
- Implementing Palco's policies for setting up a temporary call center and other operational departments at a secondary location.
- Training employees on how to carry out essential functions in a secondary facility, as well as on what information to provide parties who inquire about the disaster recovery and Palco's response.
- Executing Palco's communication plan as developed by the communications team and the Primary Team Leader.

Part of our new staff onboarding, and training includes the DRP. We also provide staff with a copy of the DRP and orient them to its provisions. At least quarterly, the Palco management team reviews and tests the DRP and makes any necessary updates or revisions. Testing includes walkthroughs, simulations, parallel testing, and full-interruption testing. The Human Resources department distributes and communicates any changes to the plan to the staff.

Our staff are cross trained in a variety of tasks. In addition, we offer robust instructional materials for carrying out key tasks. If many of our staff were unavailable, other staff members could readily fill in, and we would bring in temporary staff, who would be rigorously trained to carry out key functions. If staff are prevented from carrying out their essential functions at our primary location, we have the following provisions in place:

- Palco maintains a secondary location if our primary location becomes unavailable.
- The secondary site contains computers that are protected by password and other operational-integrity mechanisms, as well as virus and malware protection, to ensure proper authorization has been granted for access to computer files.
- Each employee has a unique identification and password to enter computer workstations and software. Each employee's security level determines their access to computer files.
- Backups are in the cloud in real-time, and all systems are capable of cloud-based computing.
- All data is backed up with appropriate failovers to ensure continual business functionality.
- Our phone system has soft phone capability to run from a secondary site as a customer service center unit or from remote locations. As our Customer Support Center is equipped with silent monitoring, full quality assurance protocols are ensured, no matter the location of our customer service representatives.
- Our online web portal allows staff to work in remote locations when they are unable to come to work due to disaster, illness, or other circumstances. VPN functionality also allows them to access their work desktops and server and cloud data files, as well as important software.
- Palco's IT staff maintains a set of backup laptops equipped with Microsoft office and other relevant programs on standby for issuance in anticipation of events which may otherwise impact daily operations, such as inclement weather.
- Servers are connected to an uninterruptable power supply system (UPS), which conditions incoming power to the server and provides sufficient processing time for the server to be correctly shutdown in the event of a power failure. In the event of sufficient damage to the primary operational site, a second location is on standby to accommodate the necessary network traffic to keep operations running with little to no downtime.

As a secondary solution, we conduct weekly full backups and daily incremental backups of our files. These backups are kept off-site and are easily restored so staff can continue their work. We may also use analog phone lines and equipment in such a catastrophe.

The Communications DRP team member is responsible for all communication during a disaster. This includes communication with State agencies, other organizations, and even the media, if required. It is very important during disaster recovery and business recovery activities that all affected persons and organizations are kept properly informed. Information given to all parties must be accurate and timely. Procedures have been addressed to ensure that communication is quickly established while activating disaster recovery. These procedures and responsibilities include, but are not limited to:

- Communicating the occurrence of a disaster and its impact to authorities, State agencies, company partners, internal parties, clients, and other interested parties.

- ❤ Communicating the occurrence of a disaster and its impact to media contacts, if required.
- ❤ Coordinating with the DRP Team Leader and other team members on appropriate messaging, as needed.
- ❤ Notifying the relevant parties once the disaster is over and normal business functionality has been restored.

If our DRP is activated, the IT team members perform a variety of tasks to ensure the continuation of critical business processes and the protection and security of the data. This includes the following:

- ❤ Migrating IT operations to an alternate site
- ❤ Installing and implementing any tools, hardware, software, and systems required
- ❤ Ensuring that secondary servers are kept up to date in the standby facility
- ❤ Ensuring that all servers, hardware, software, and other IT tools meet Palco's IT policies
- ❤ Ensuring that all essential staff can access the hardware and software that they need to carry out normal operations

During the height of the COVID-19 pandemic in 2020 and 2021, the majority of Palco staff pivoted to remote work. This allowed our organization to continue to provide exemplary services to DHS DPSQA and the participant-directed services program. Our AR-dedicated staff worked throughout the pandemic without interruption, continuing business as usual. Our staff continued to attend meetings virtually, host Advisory Board meetings virtually, and engage with stakeholders to ensure participants did not experience any disruption in services.

Appendices

Appendix 1 – Health Care Emergency Card & Backup Declaration Tool **(CONFIDENTIAL)**
Appendix 2 – Arkansas Operational Policy and Procedure Manual **(CONFIDENTIAL)**
Appendix 3 – Detailed Training Plan
Appendix 4 – Orientation & Skills Training Guidebook (Support Coordinator Manual) **(CONFIDENTIAL)**
Appendix 5 – Post Training Assessment Draft **(CONFIDENTIAL)**
Appendix 6 – Post Training Evaluation Survey **(CONFIDENTIAL)**
Appendix 7 – Sample Employer Enrollment Packet **(CONFIDENTIAL)**
Appendix 8 – Sample Employee Employment Packet **(CONFIDENTIAL)**
Appendix 9 – Education and Outreach Companion Docs (Self-Direction Toolkit) **(CONFIDENTIAL)**
Appendix 10 – Fraud and Abuse Compliance Plan
Appendix 11 – Continuity of Operations Plan (COOP) **(CONFIDENTIAL)**
Appendix 12 – Disaster Recovery Plan **(CONFIDENTIAL)**
Appendix 13 – Voluntary Product Accessibility Template (VPAT) **(CONFIDENTIAL)**
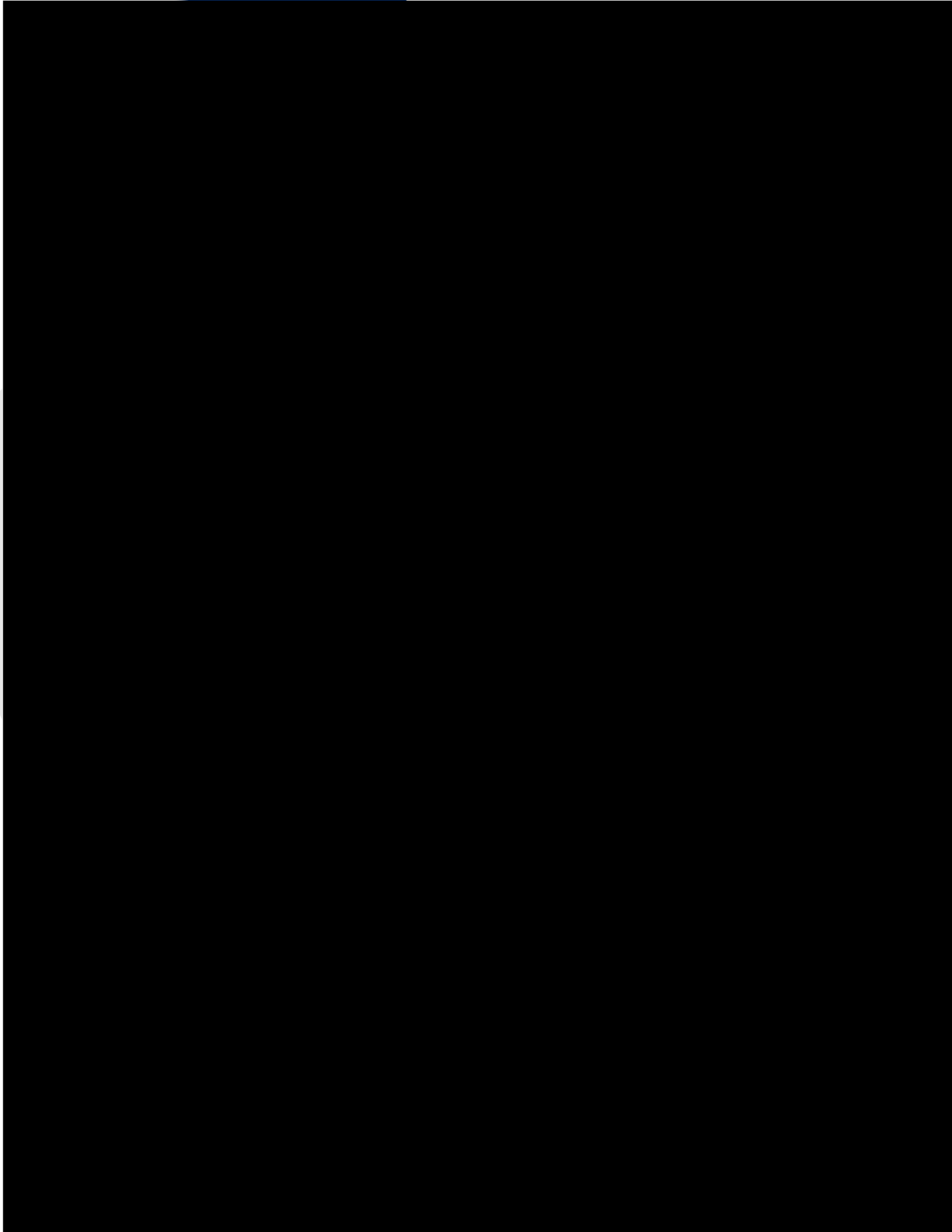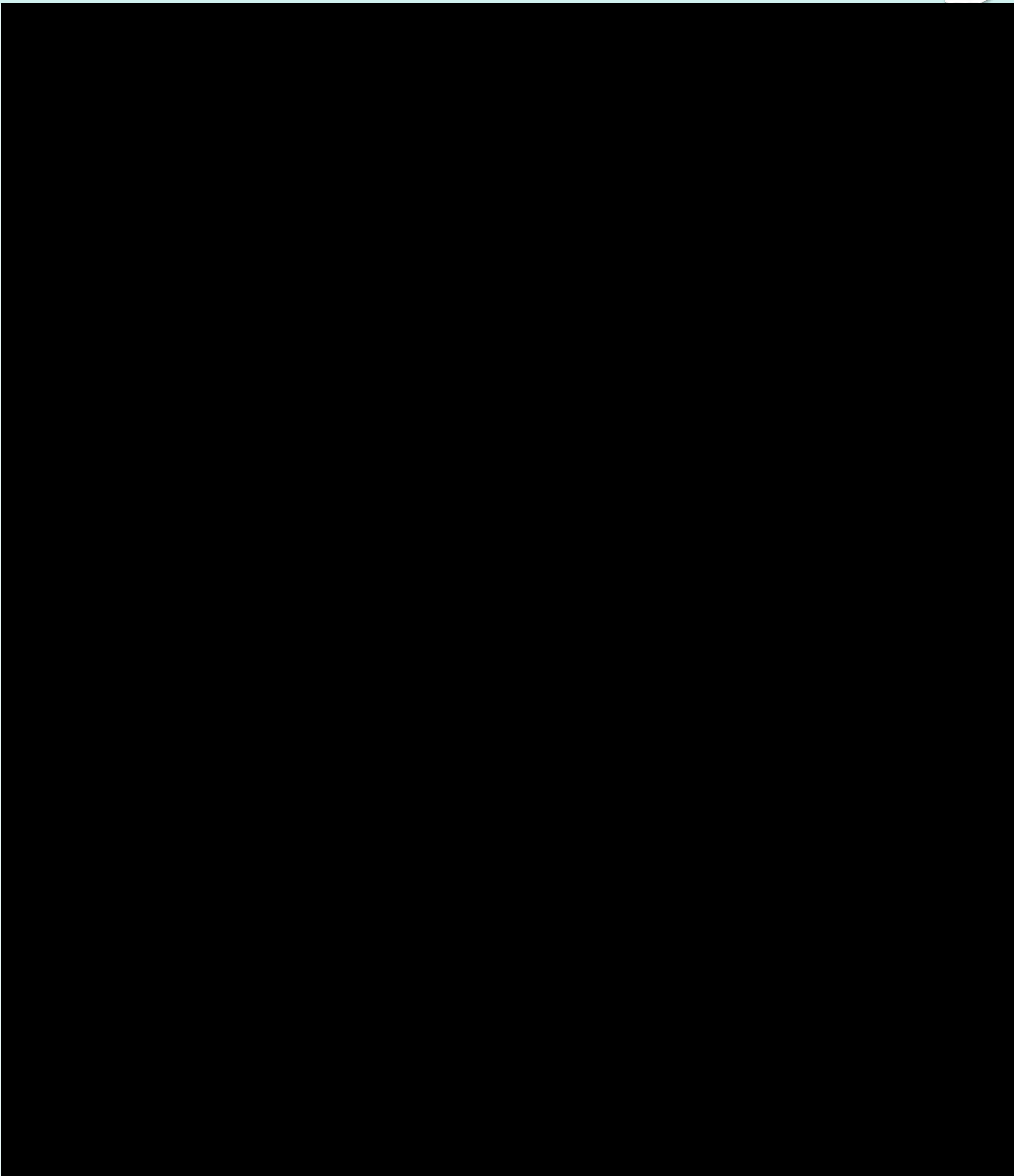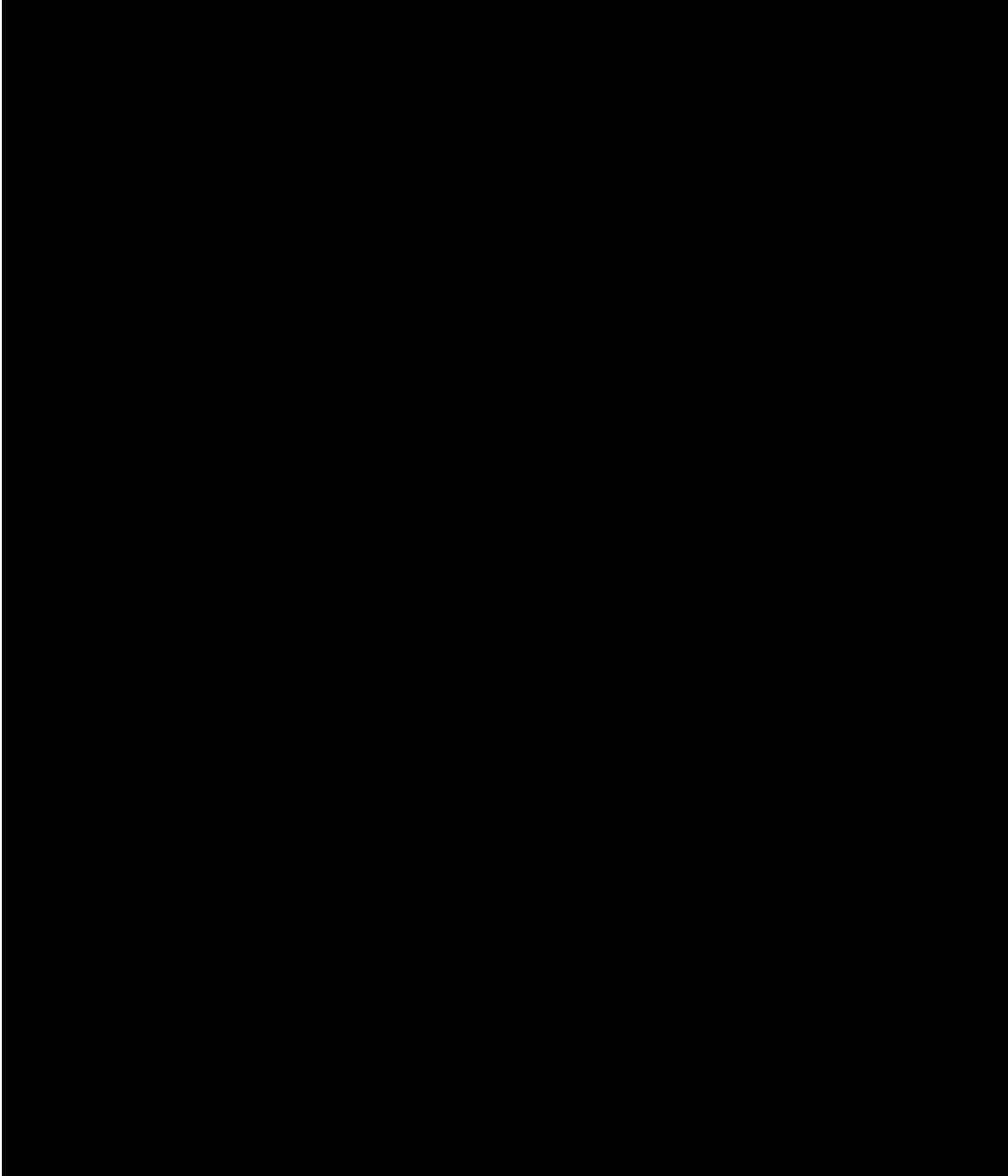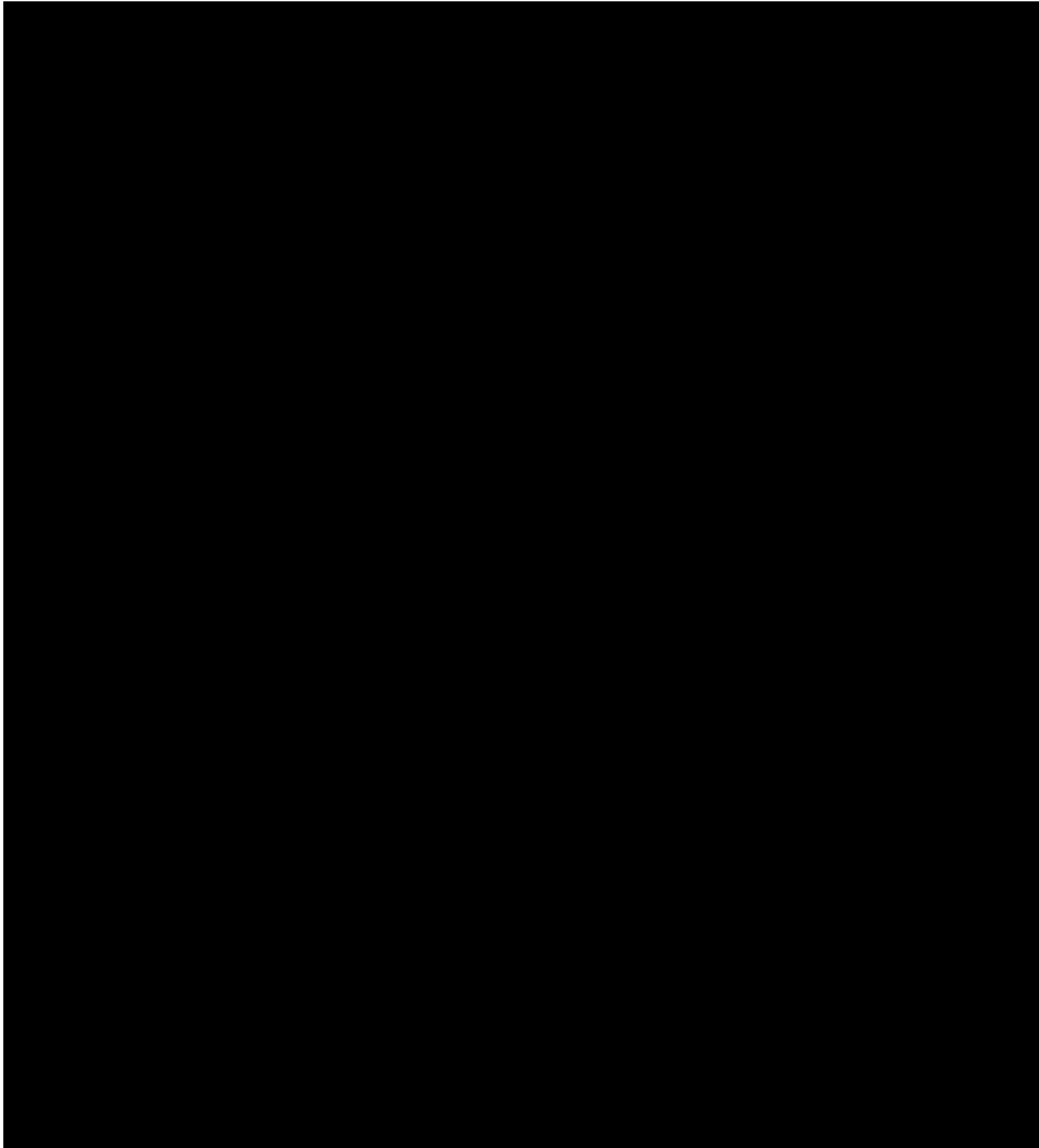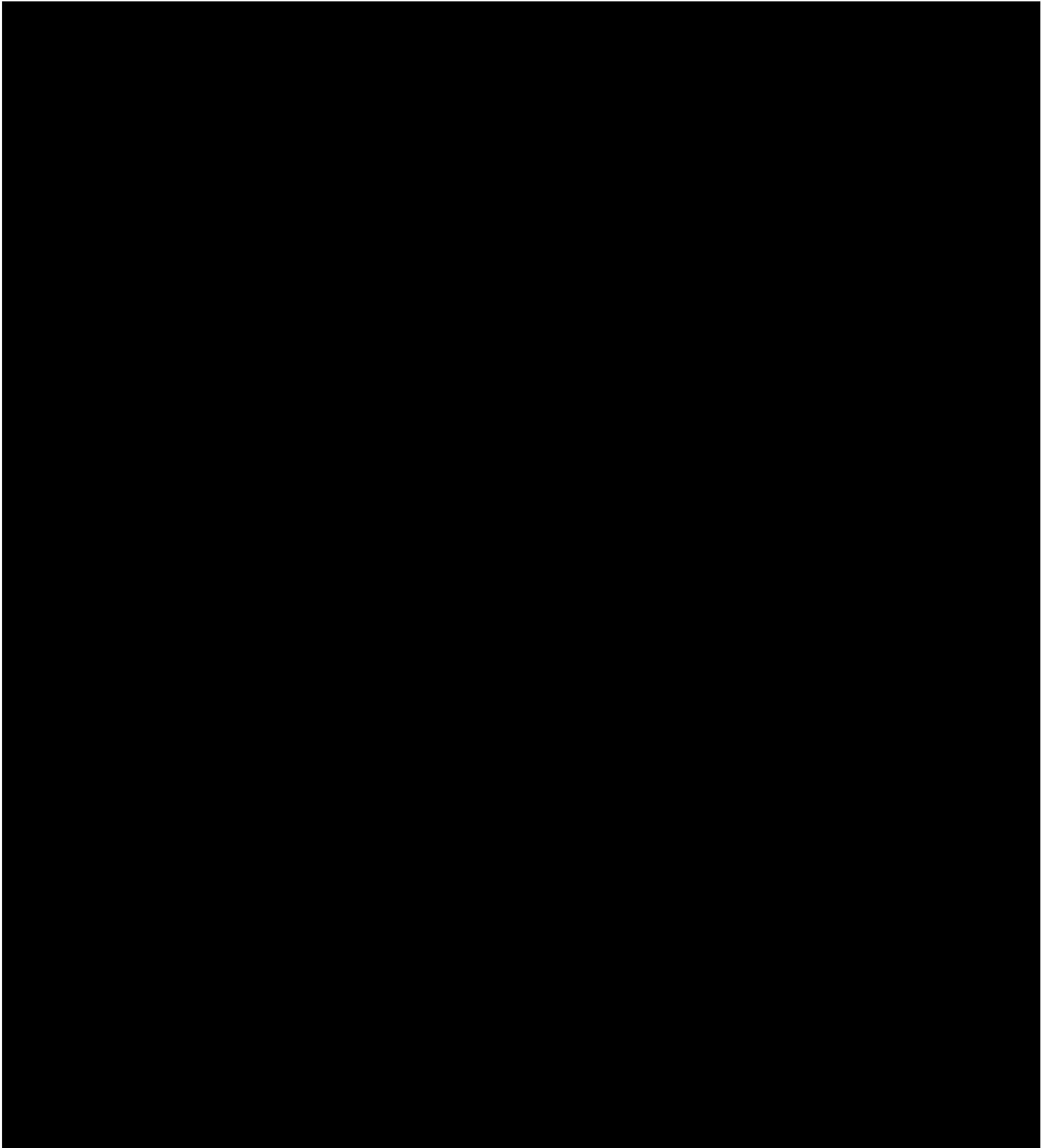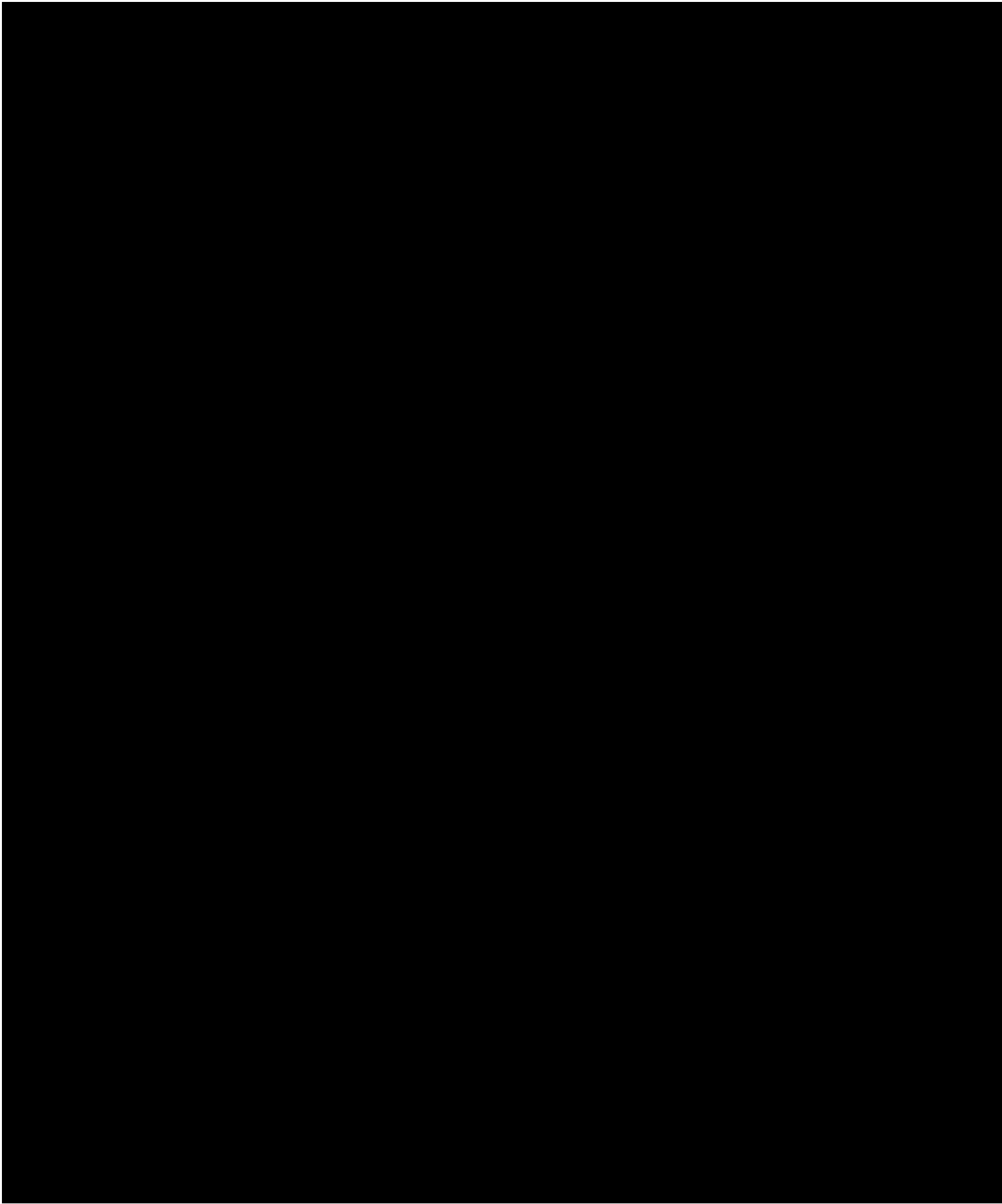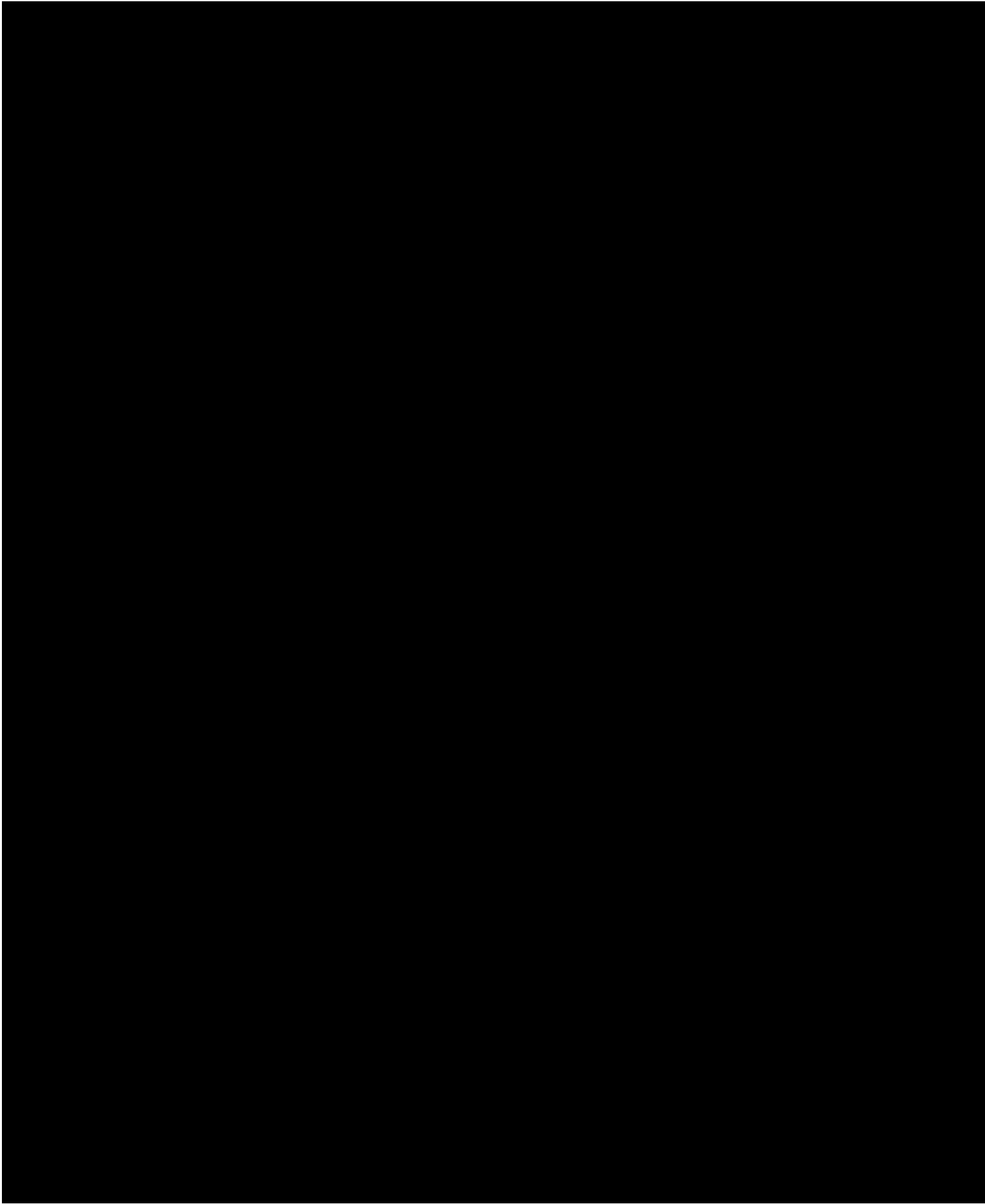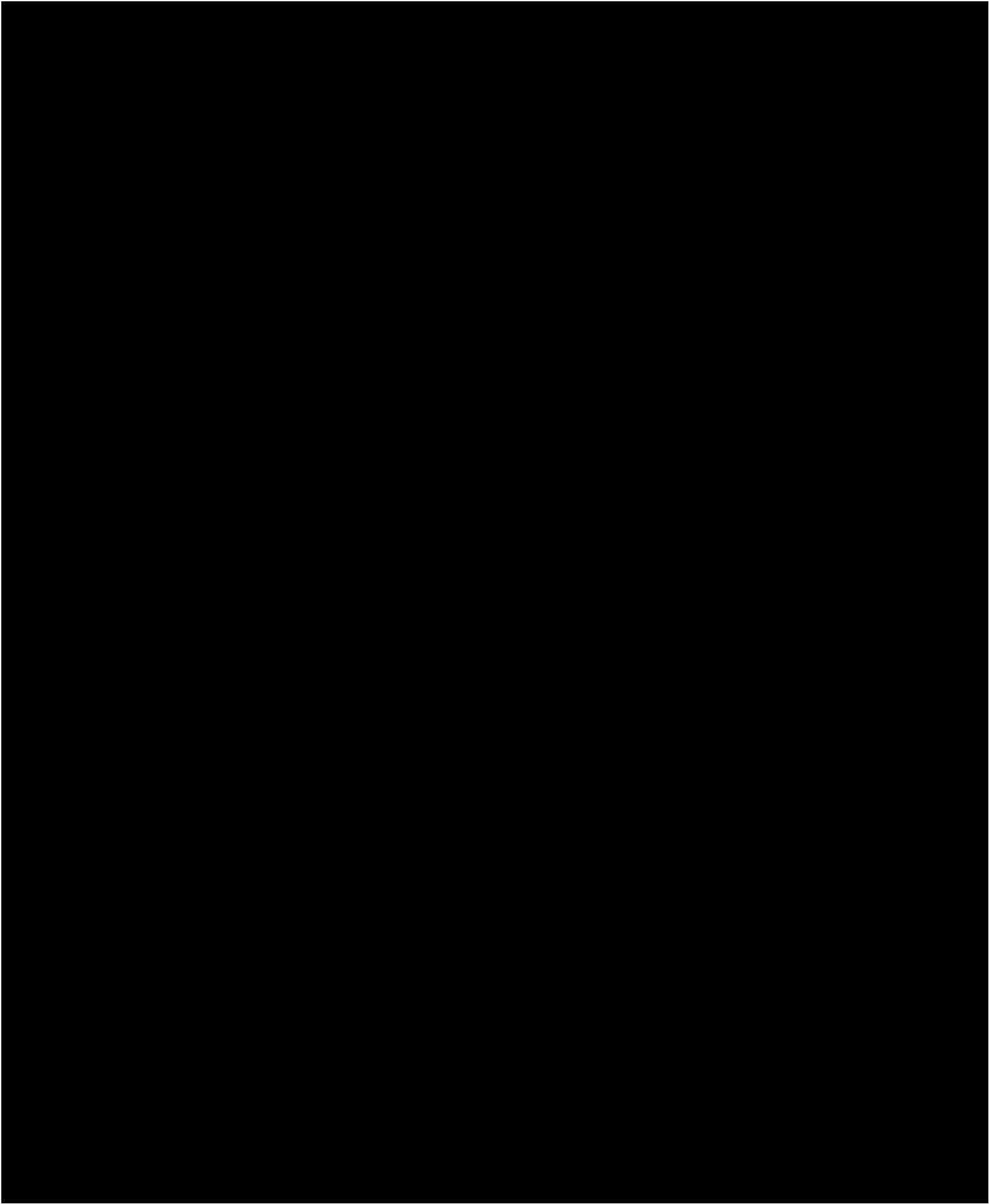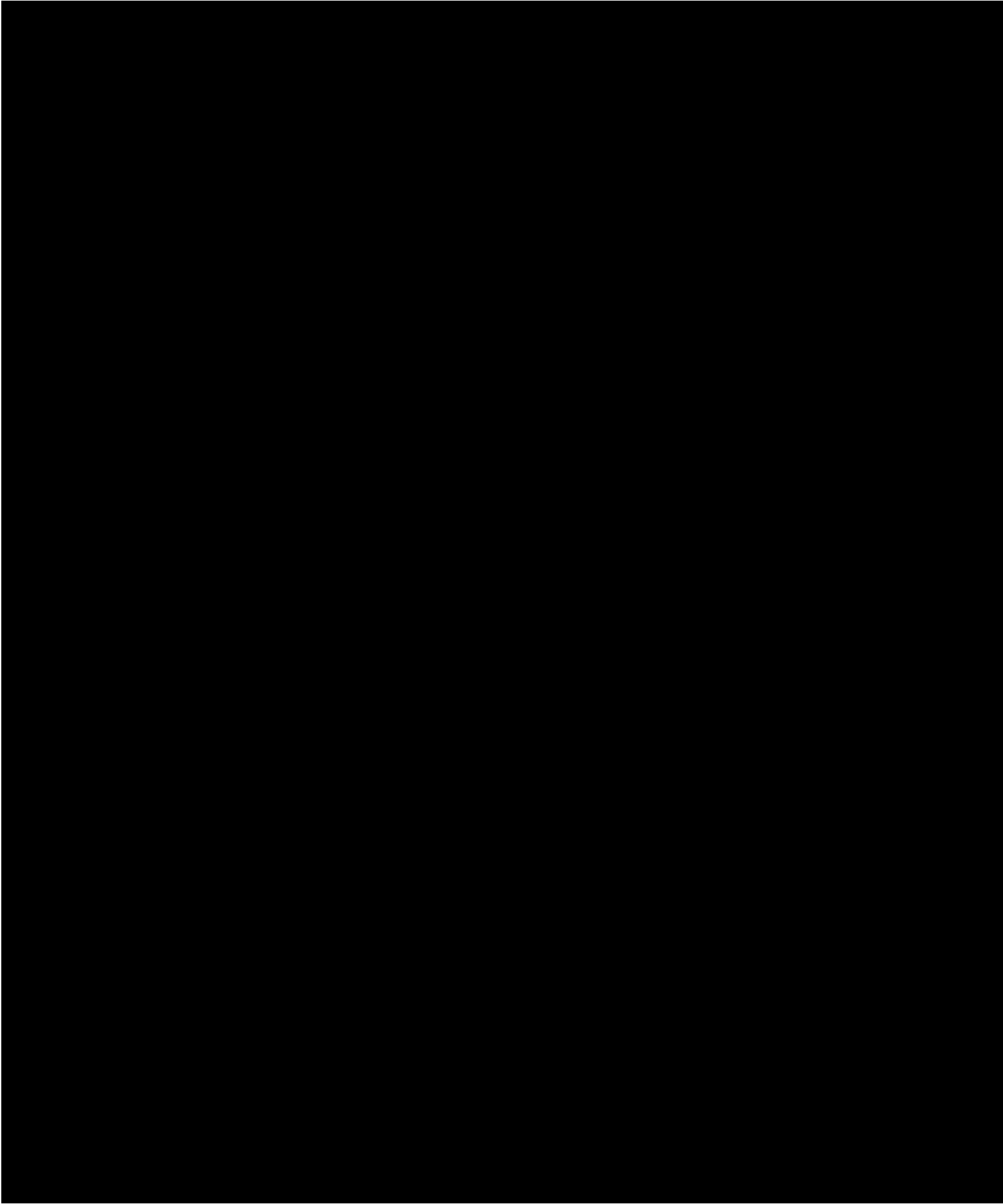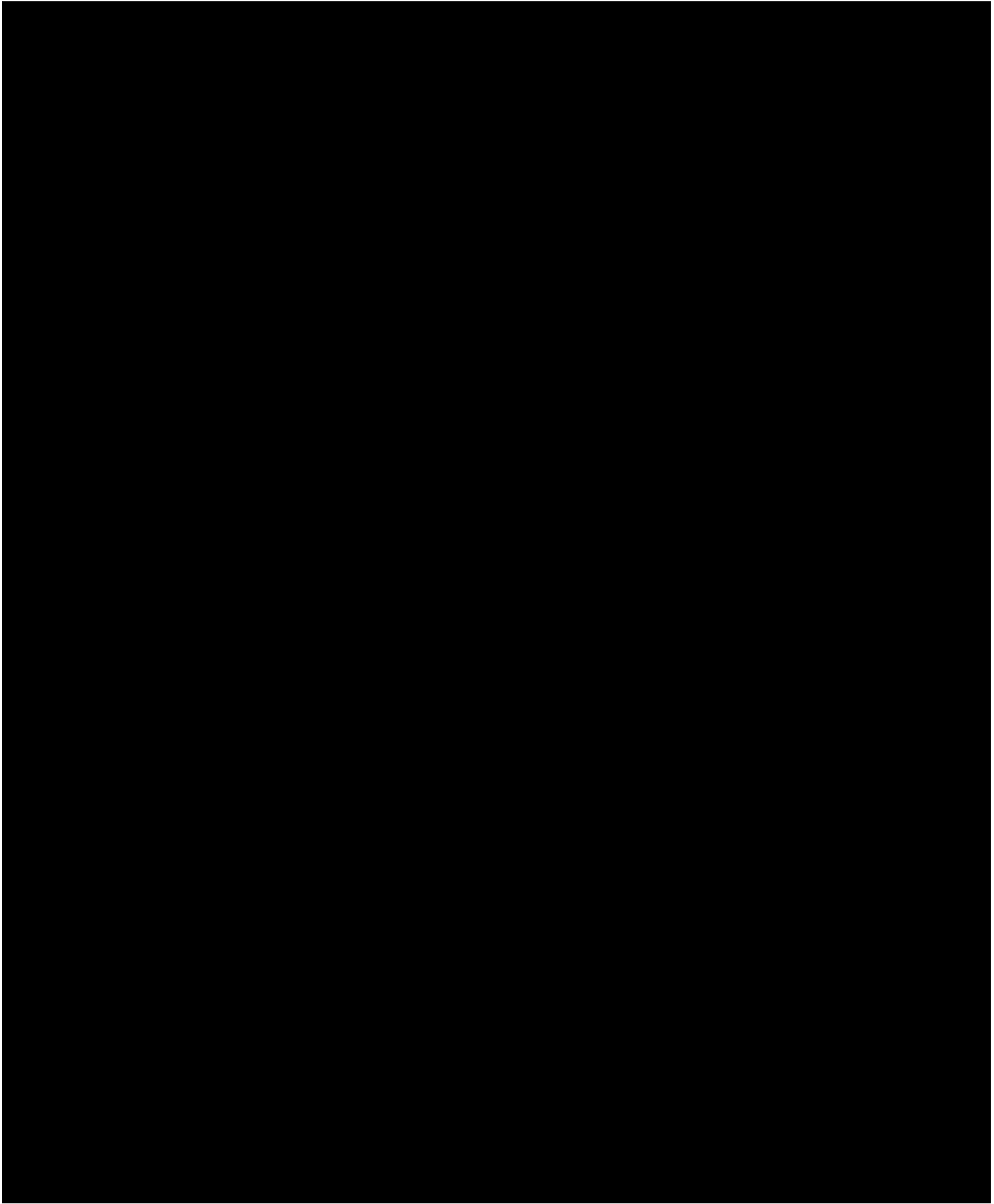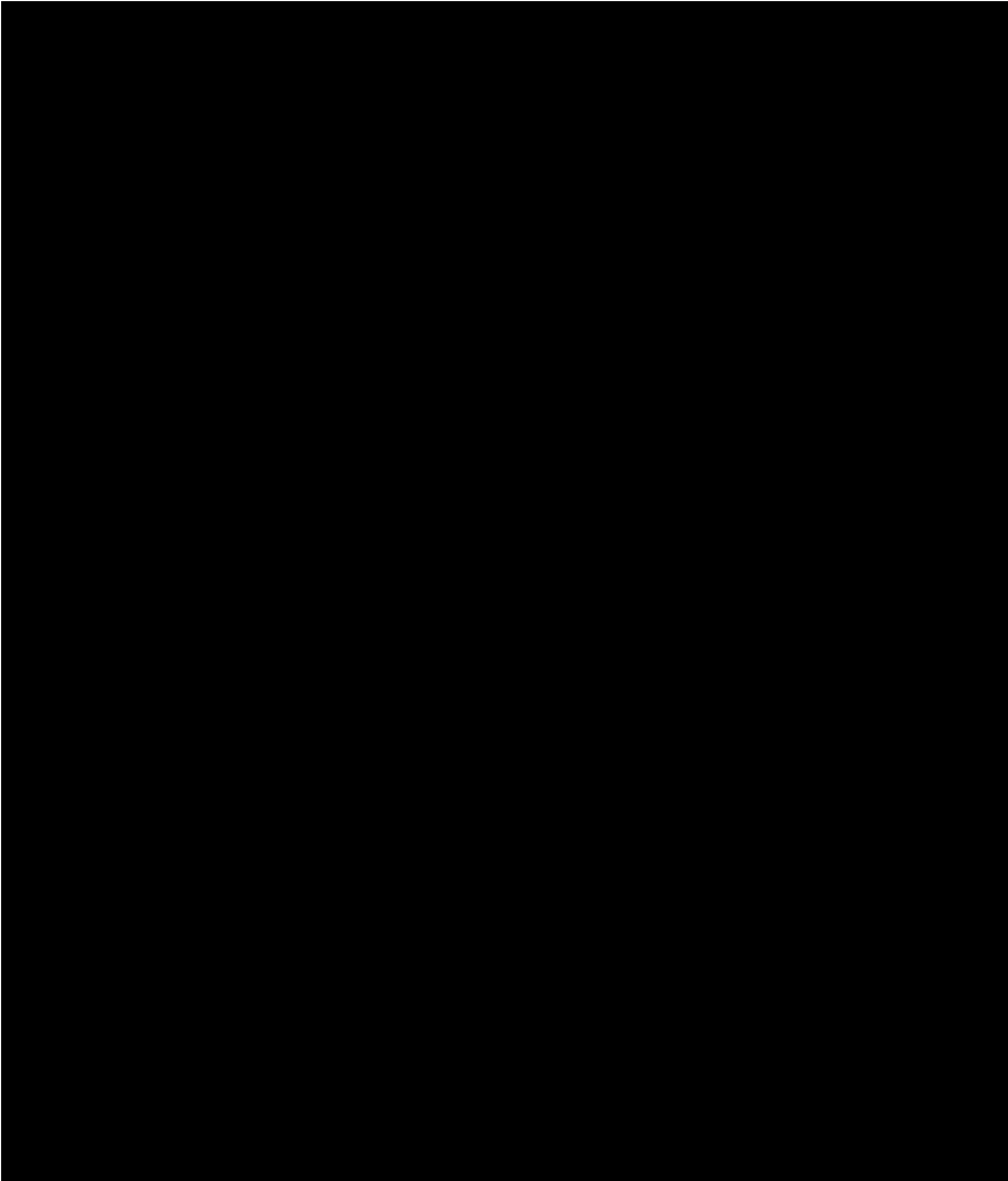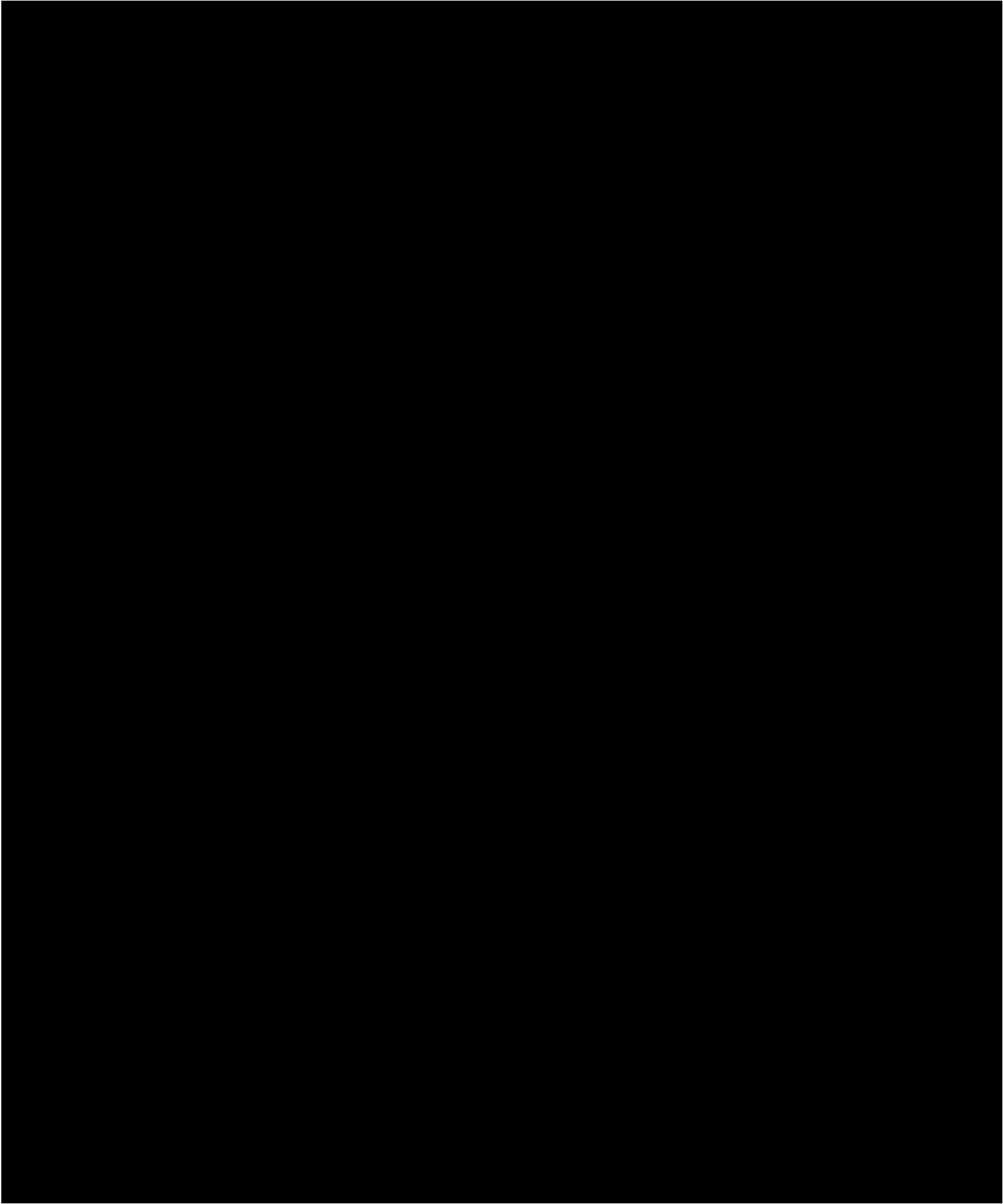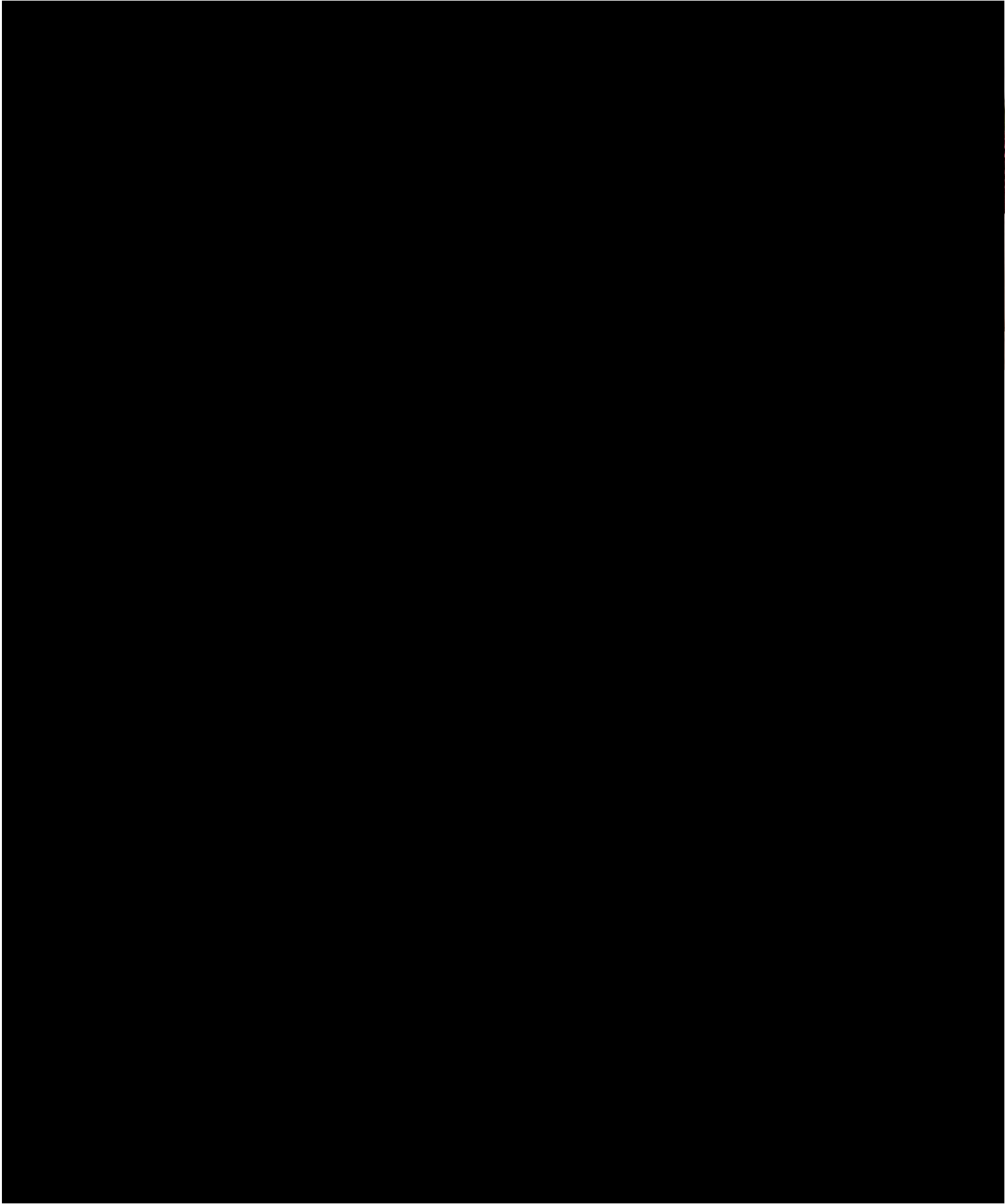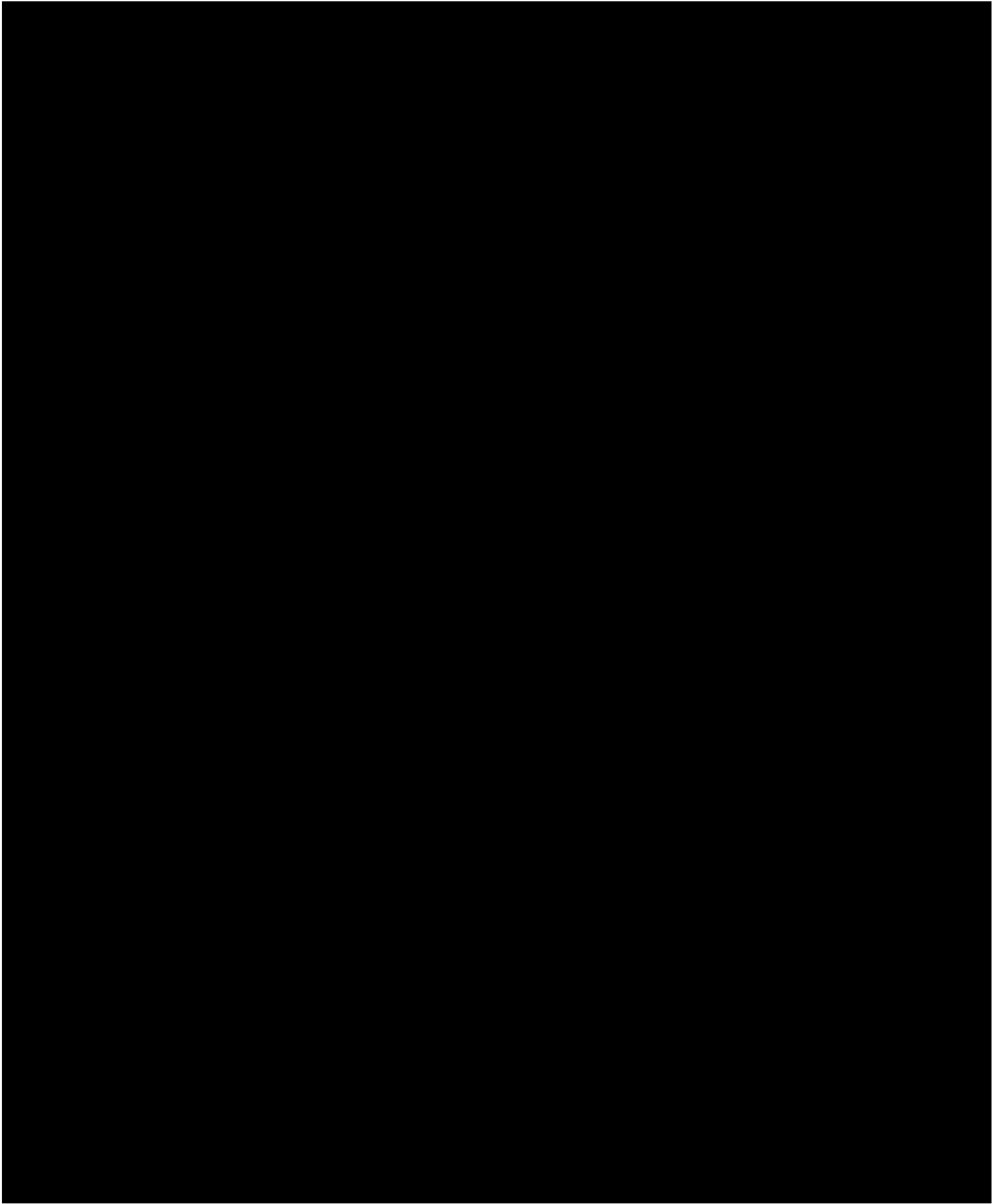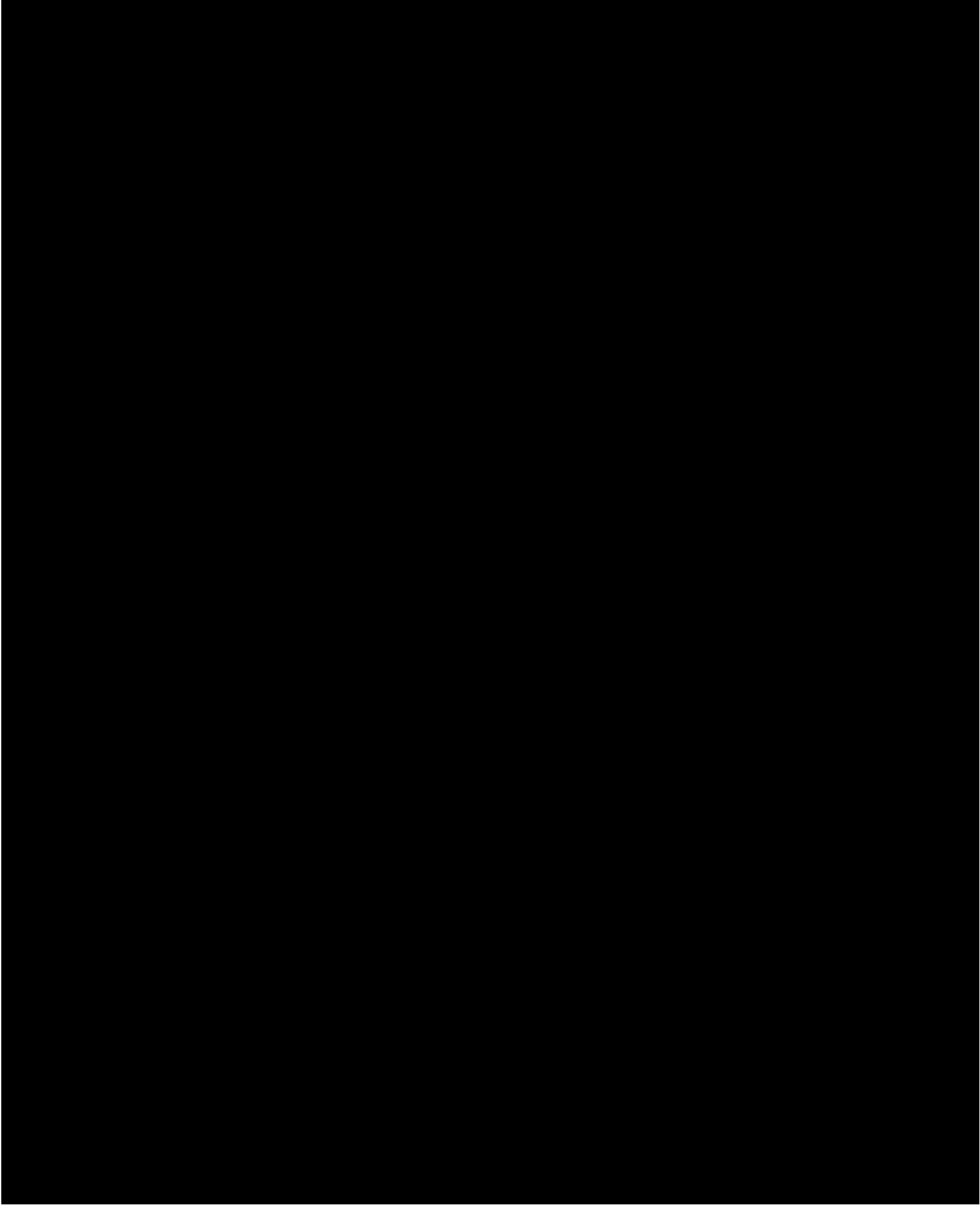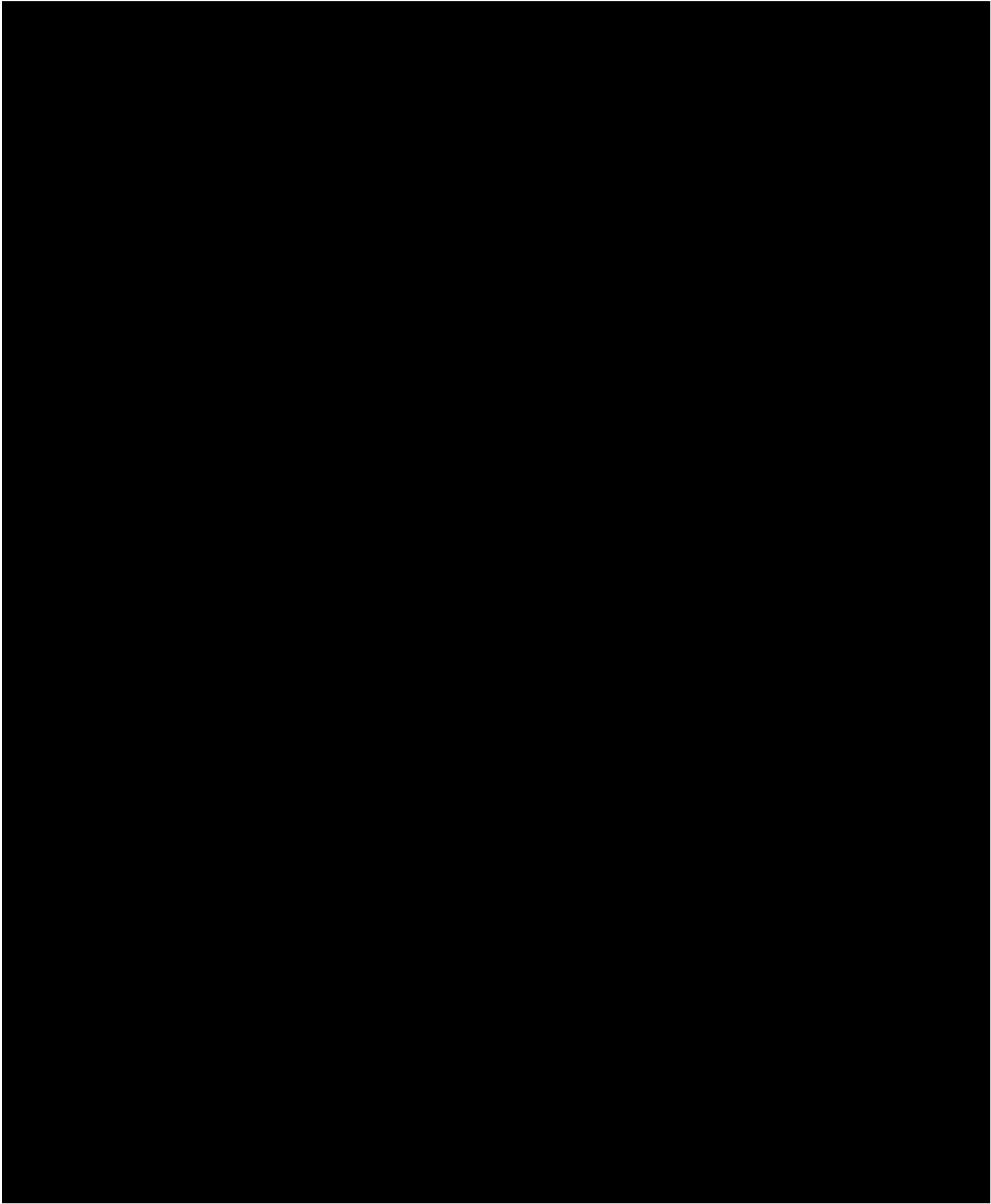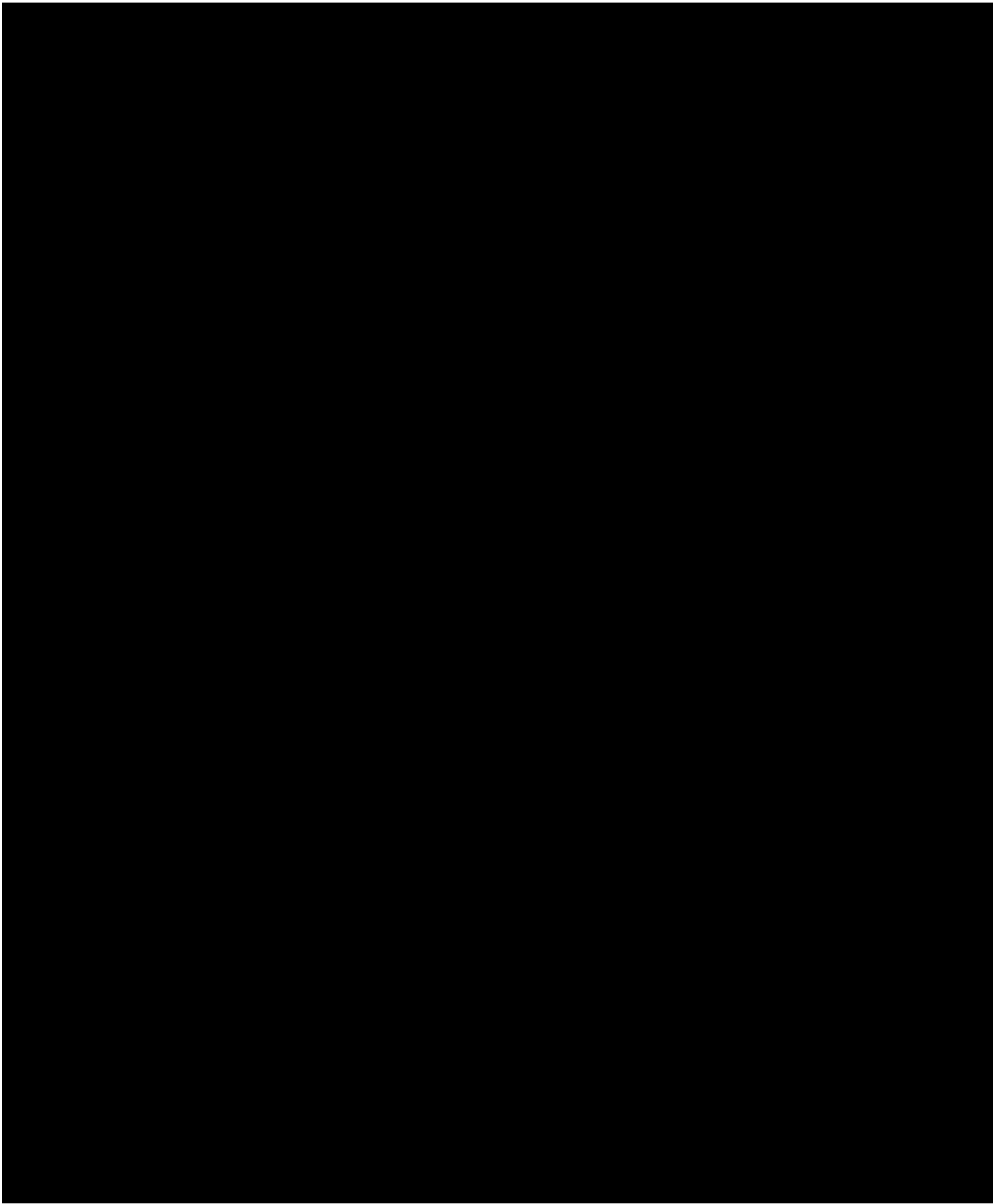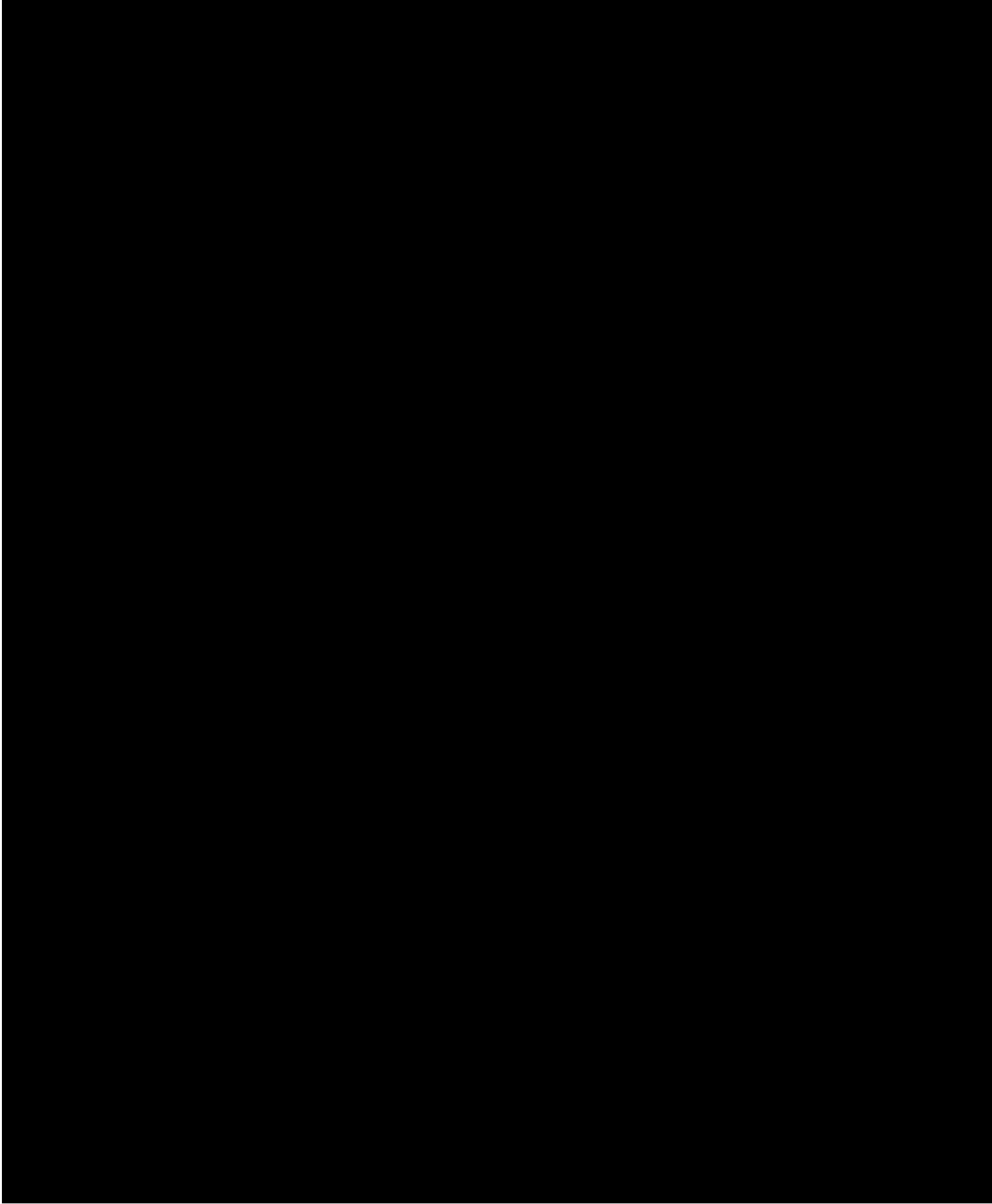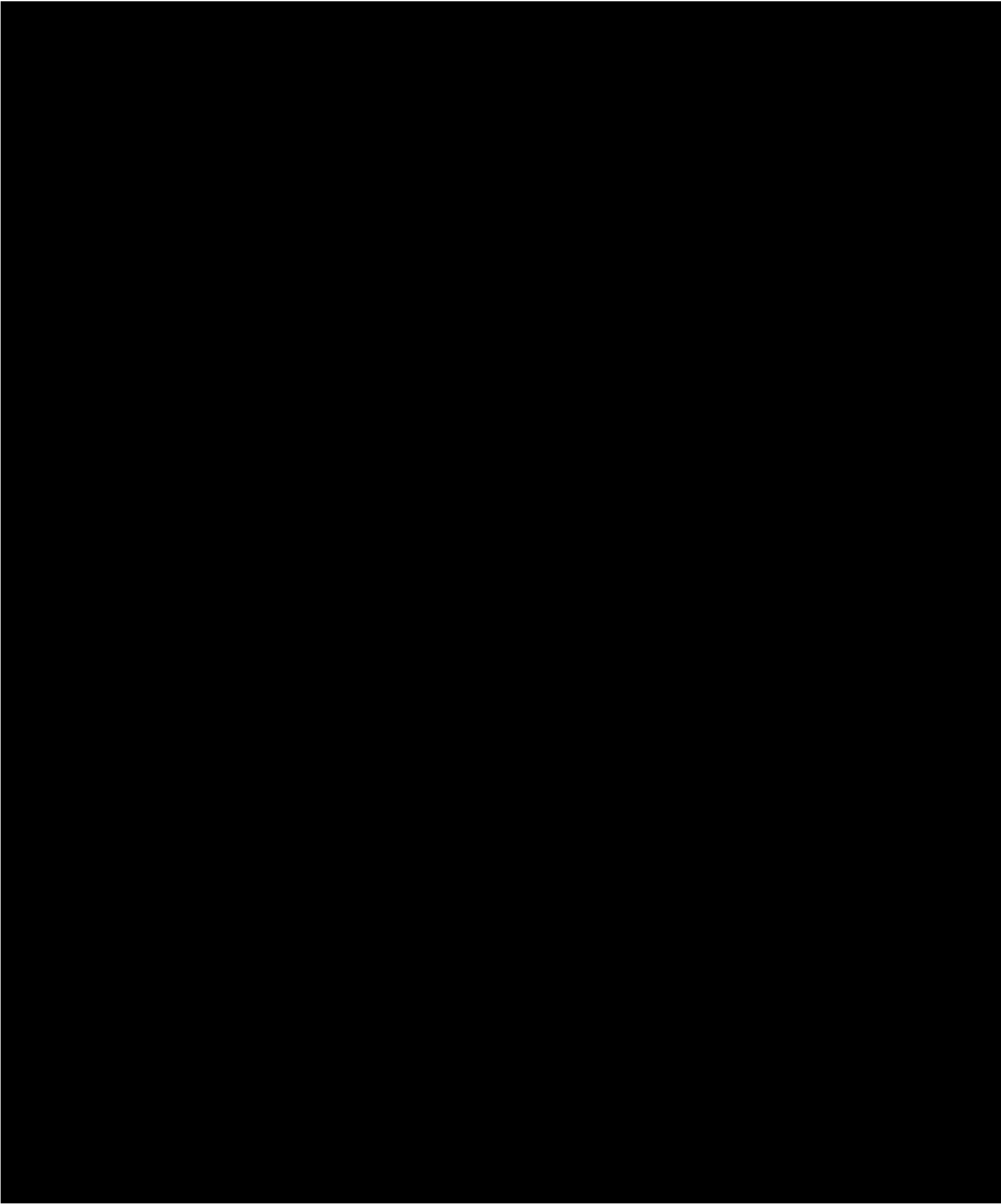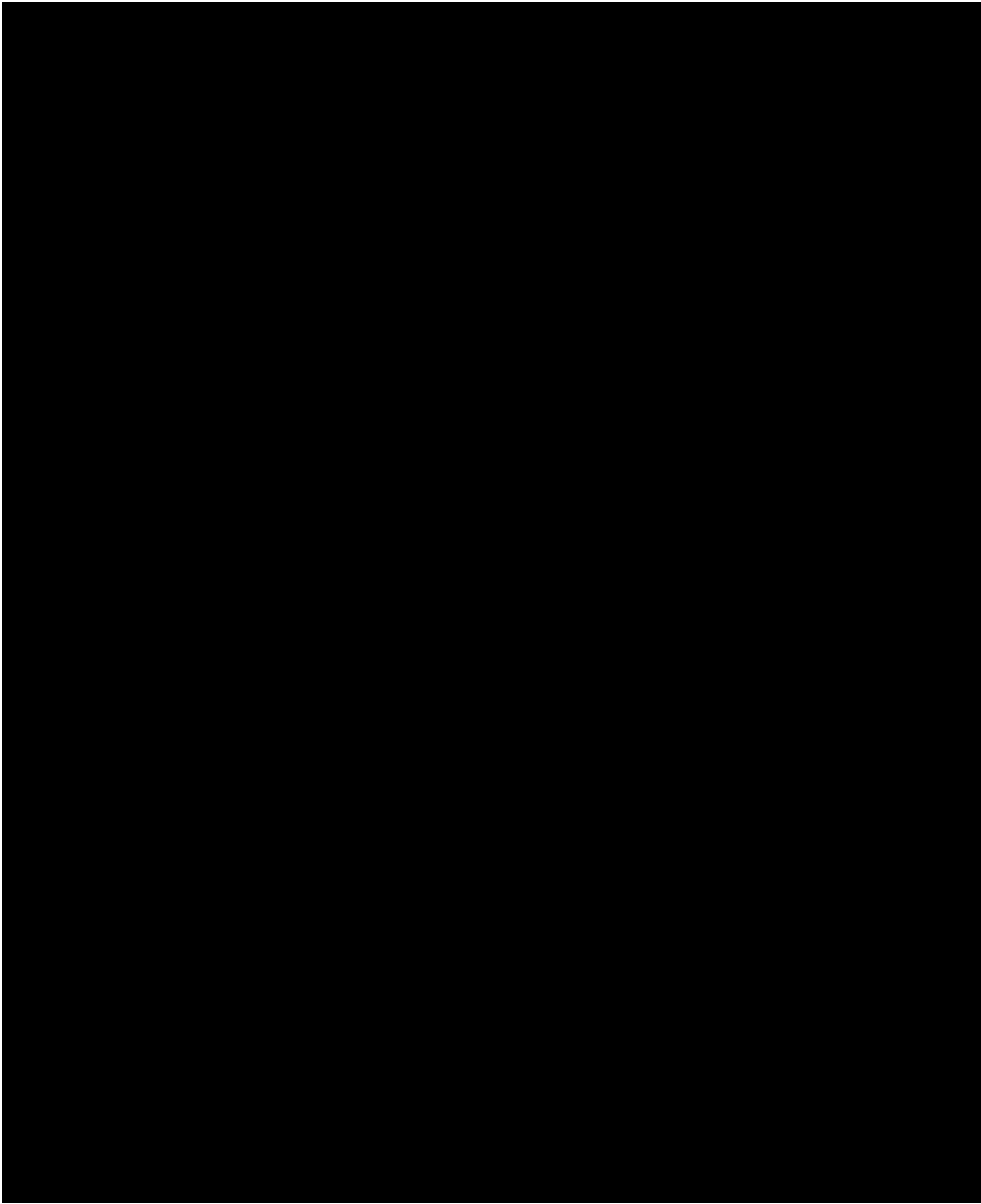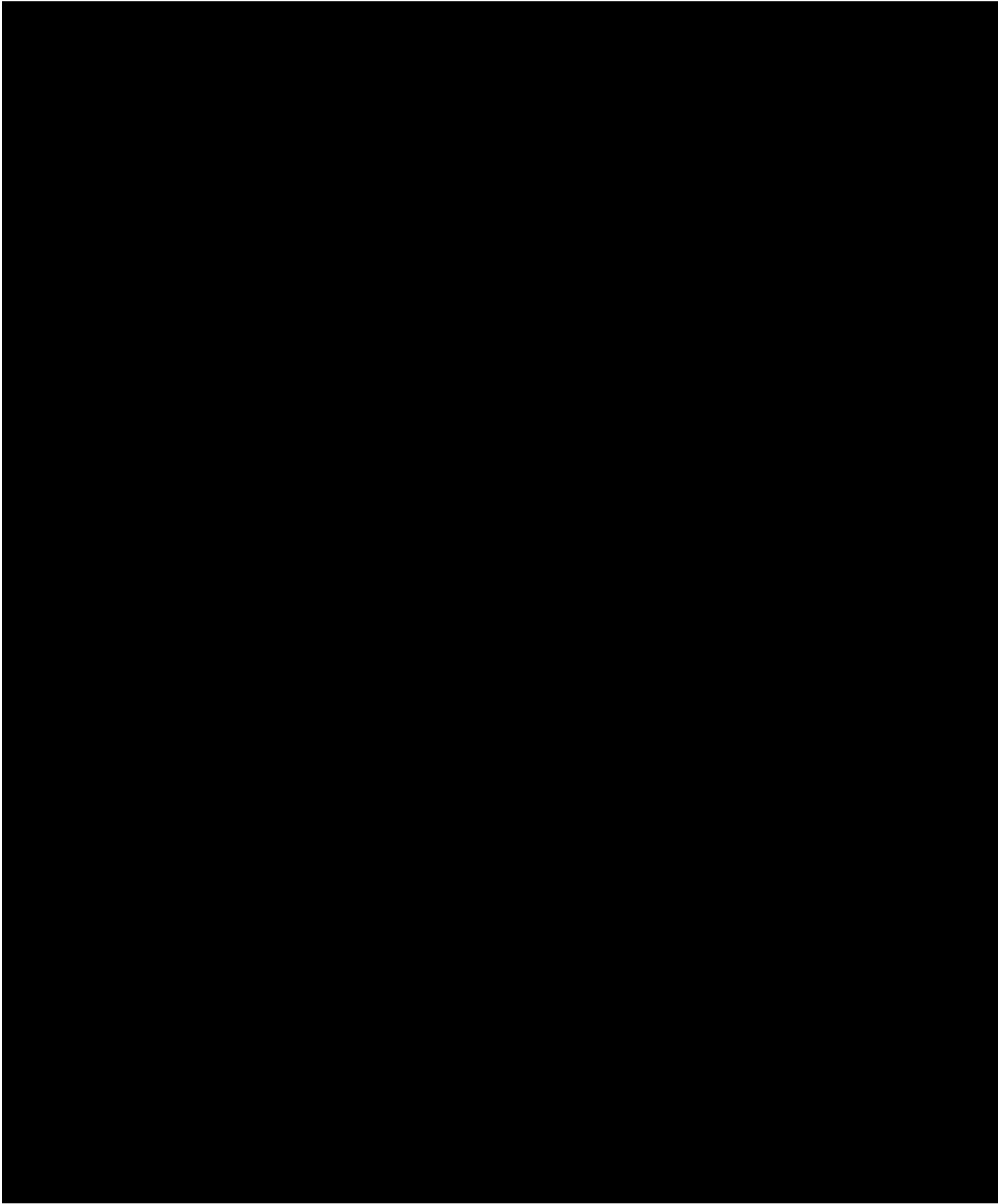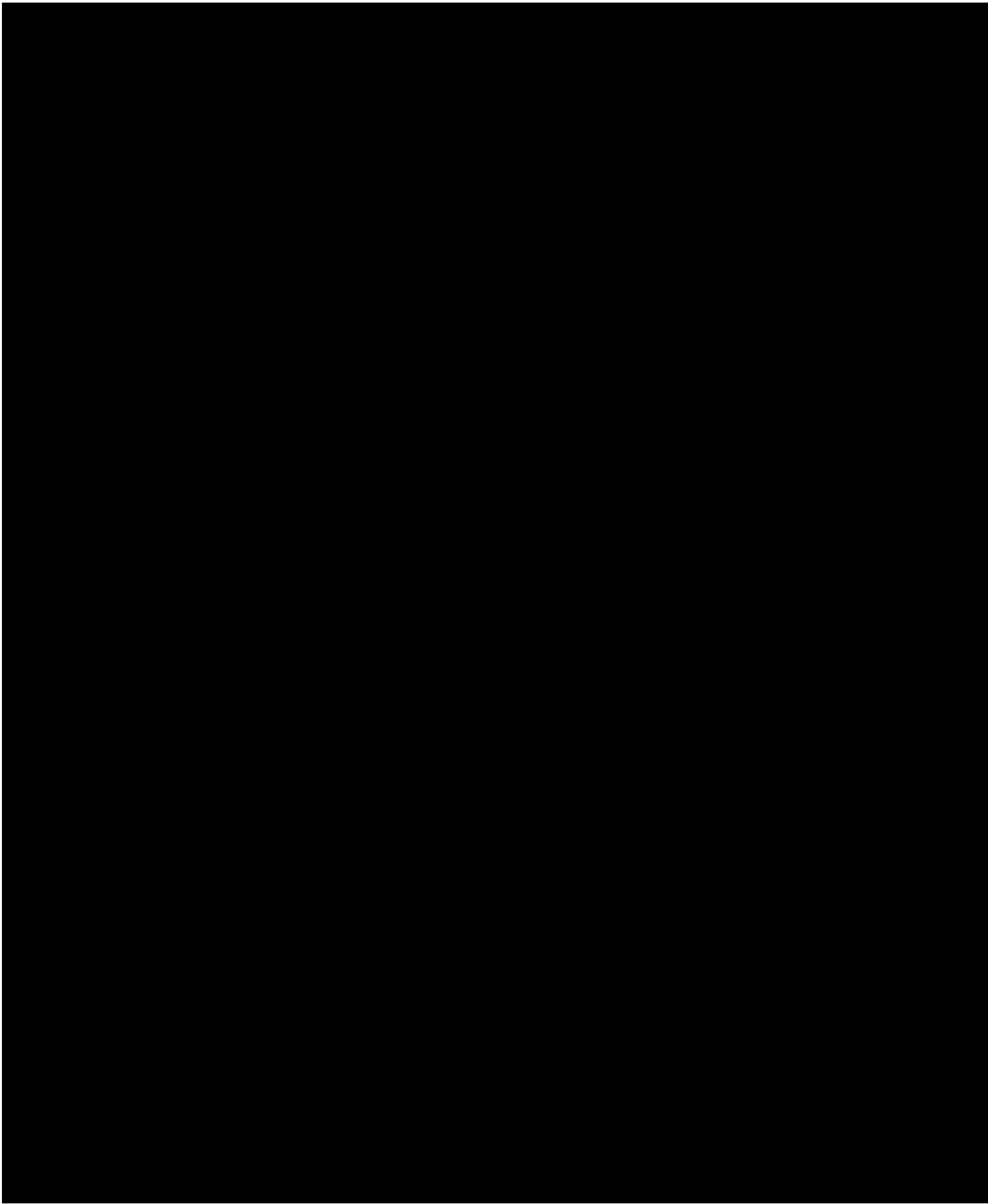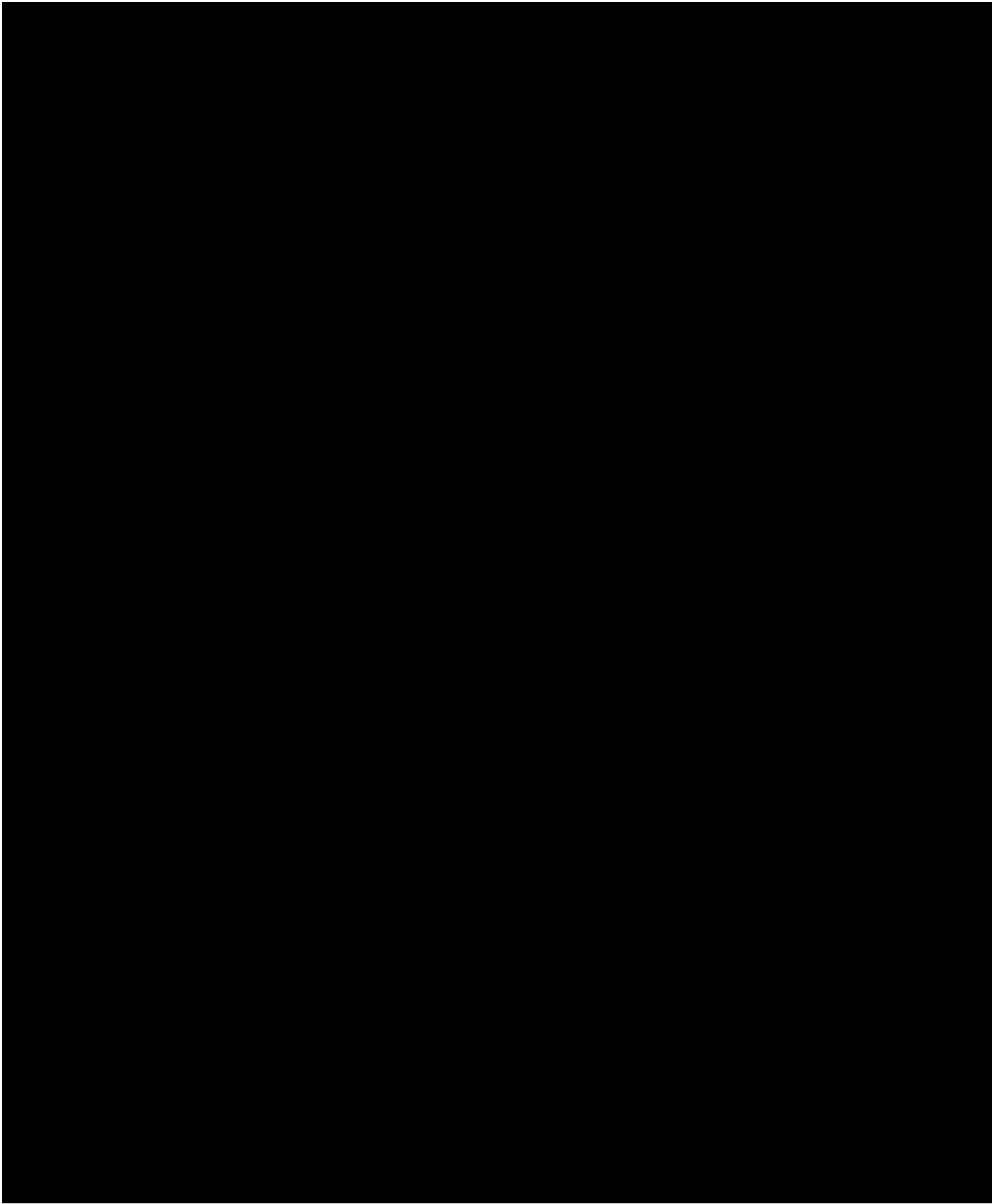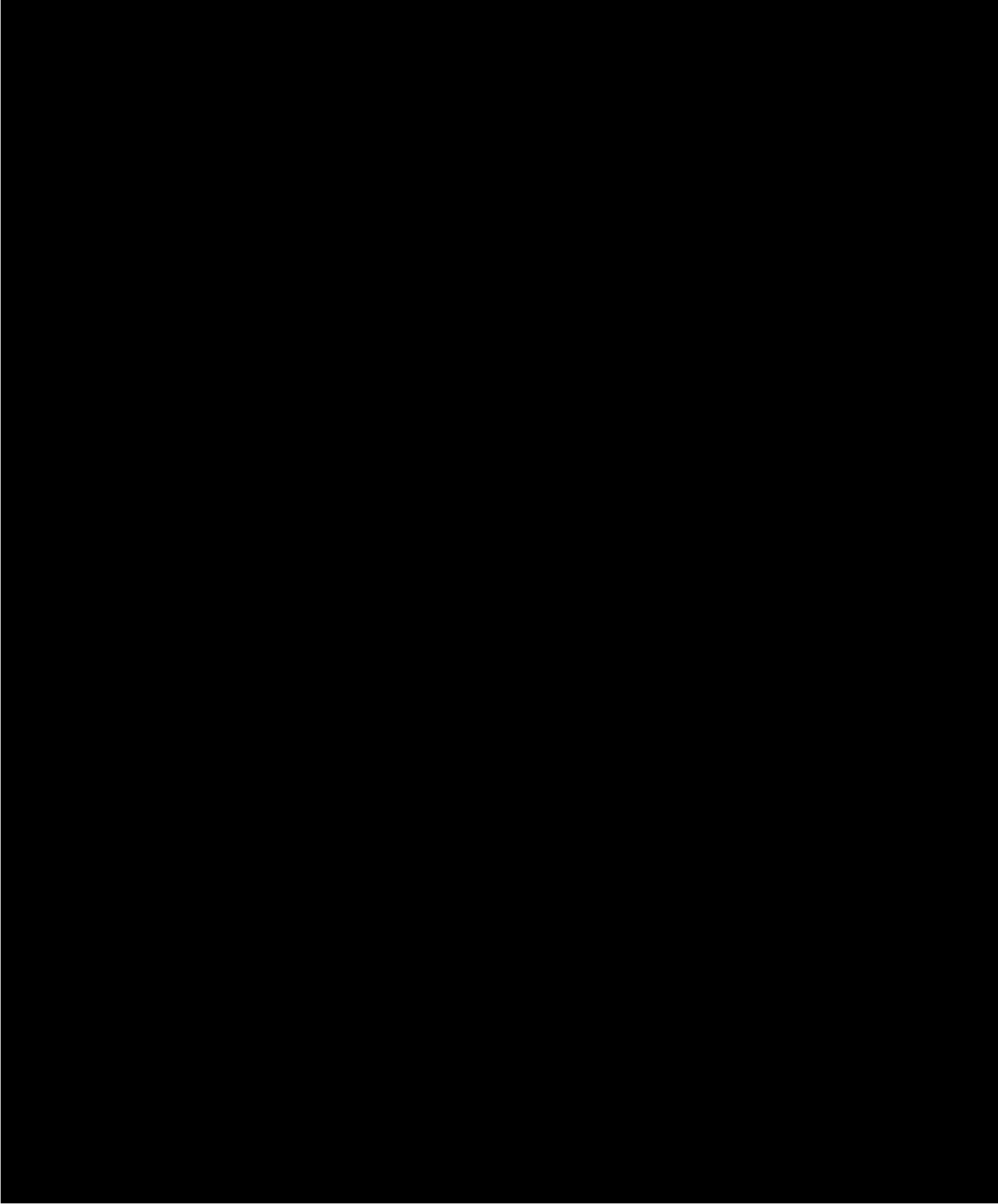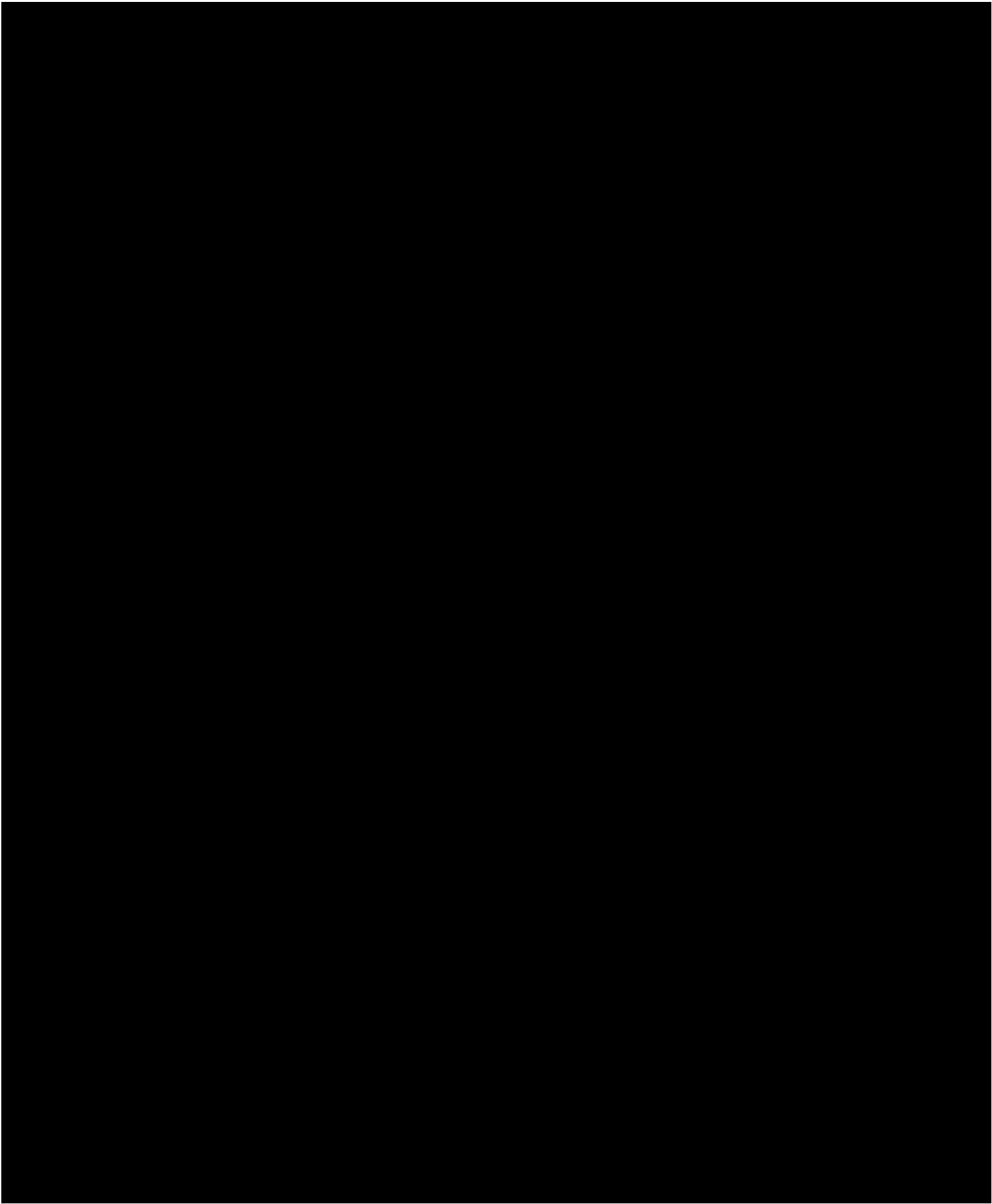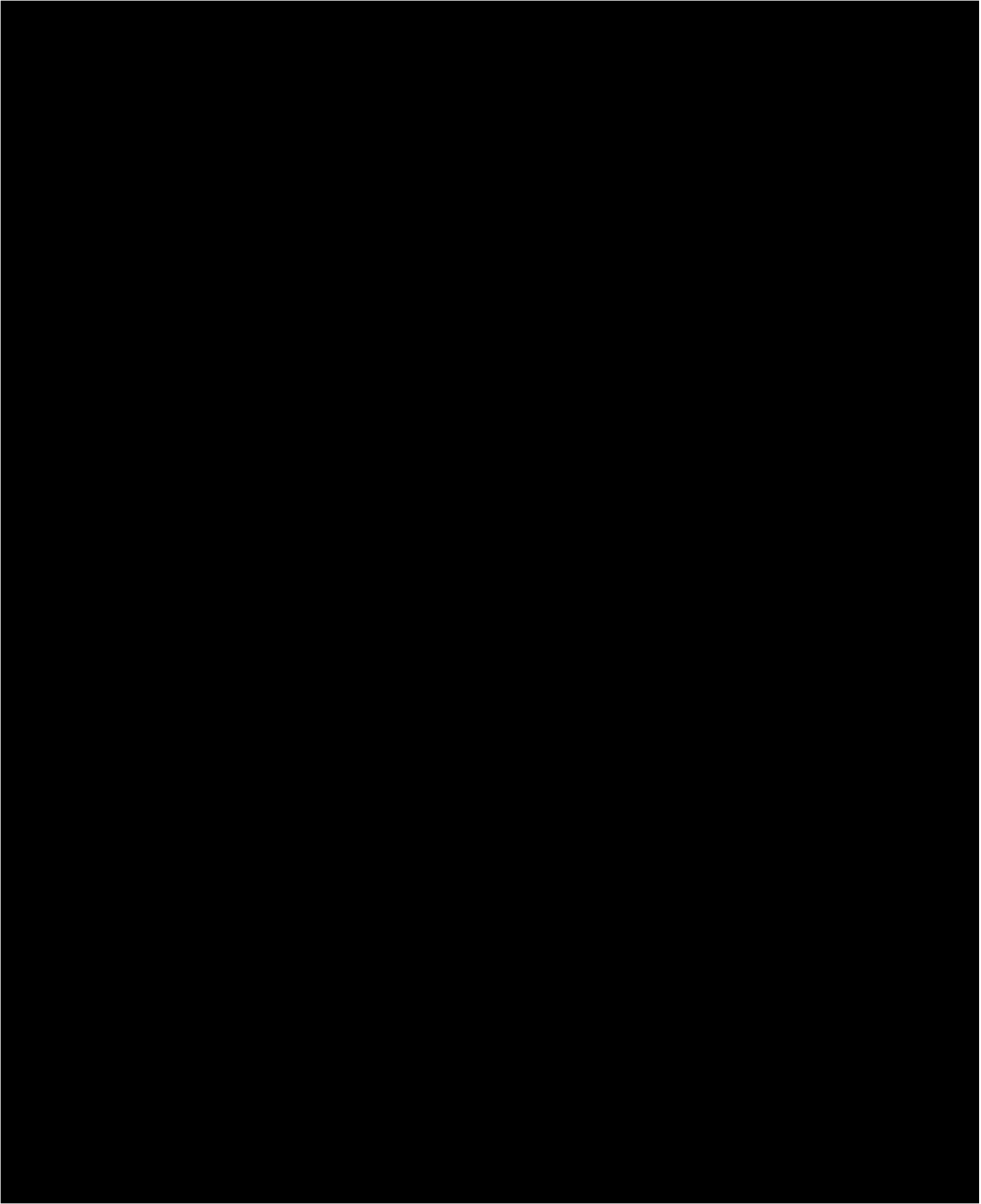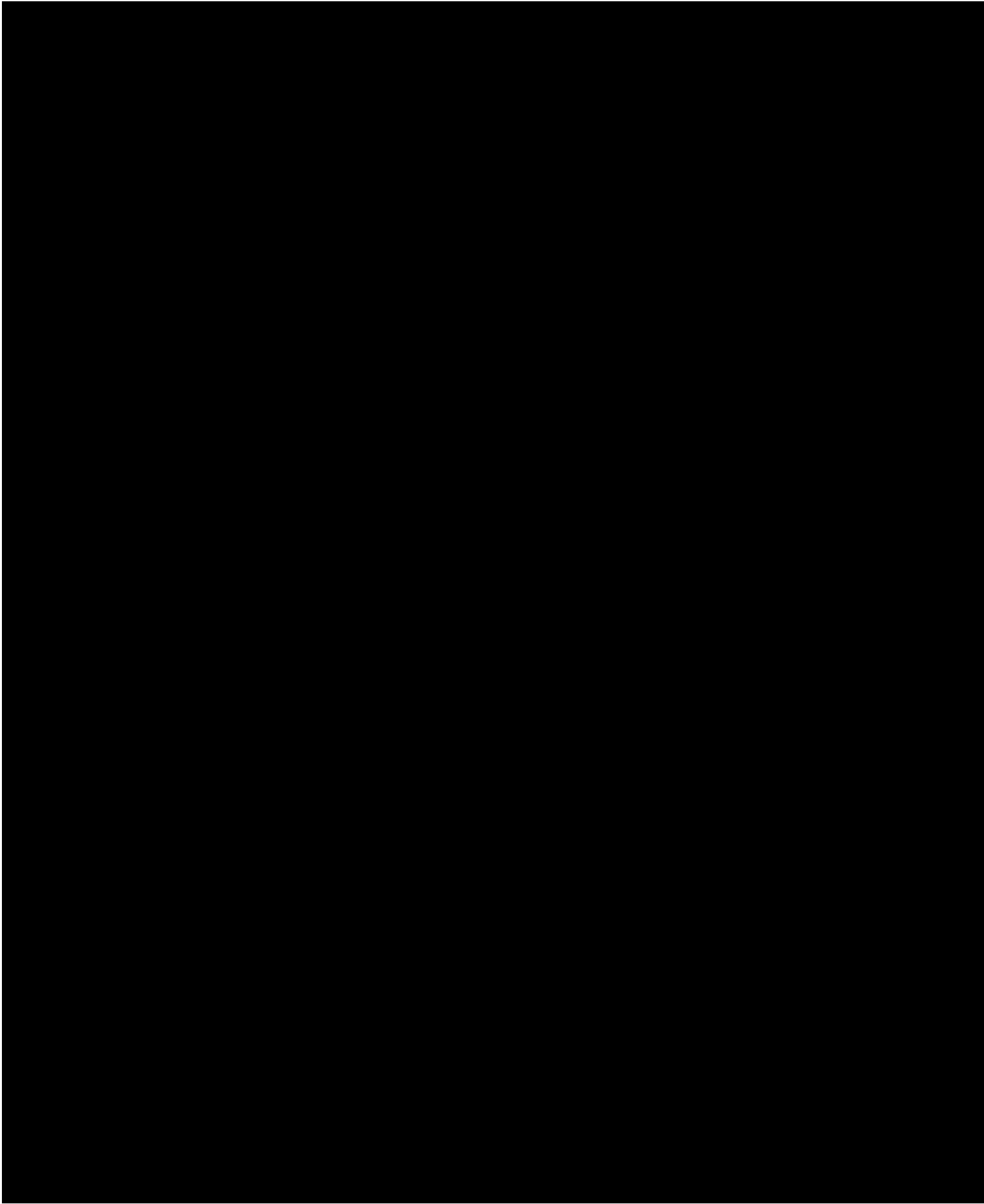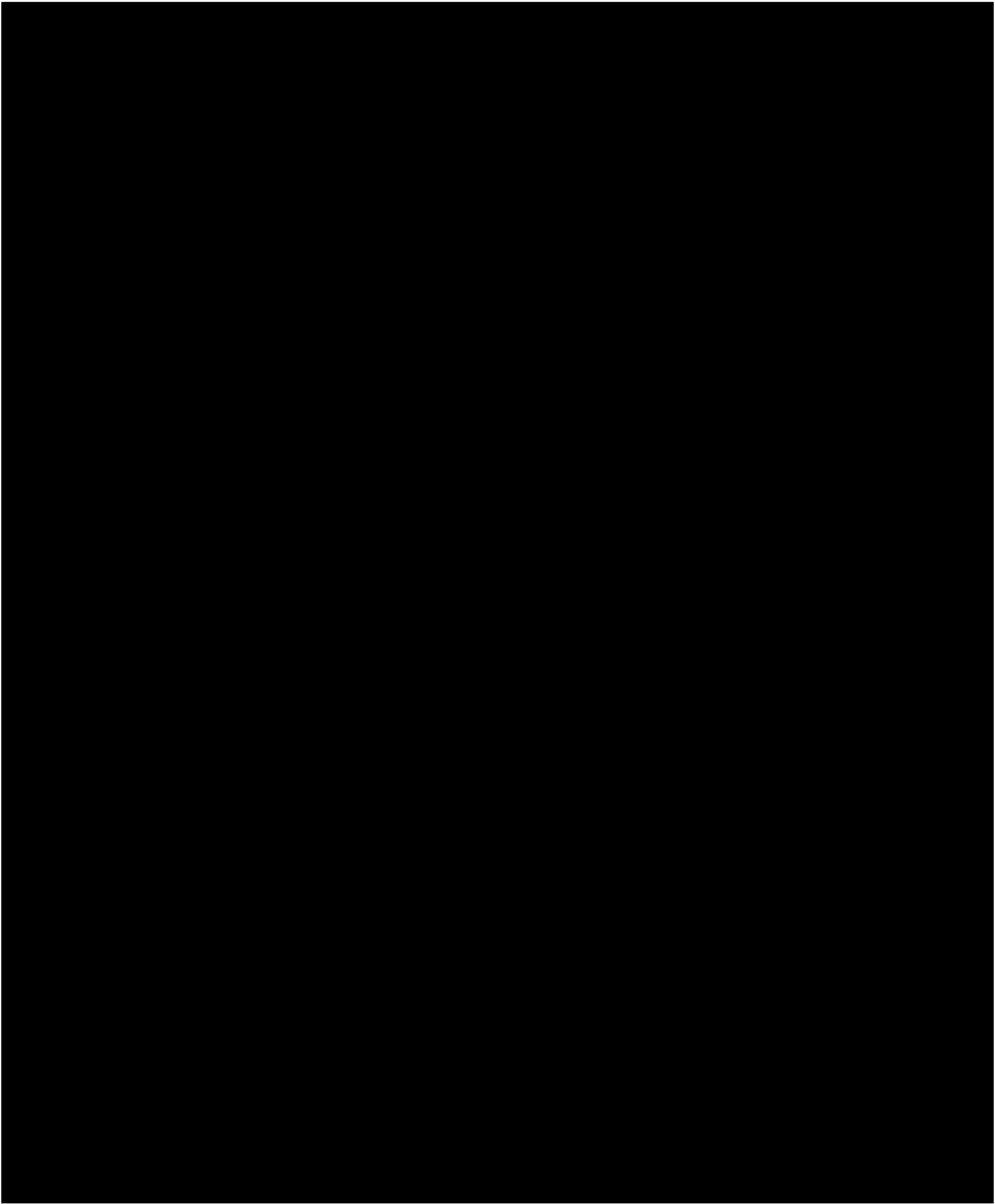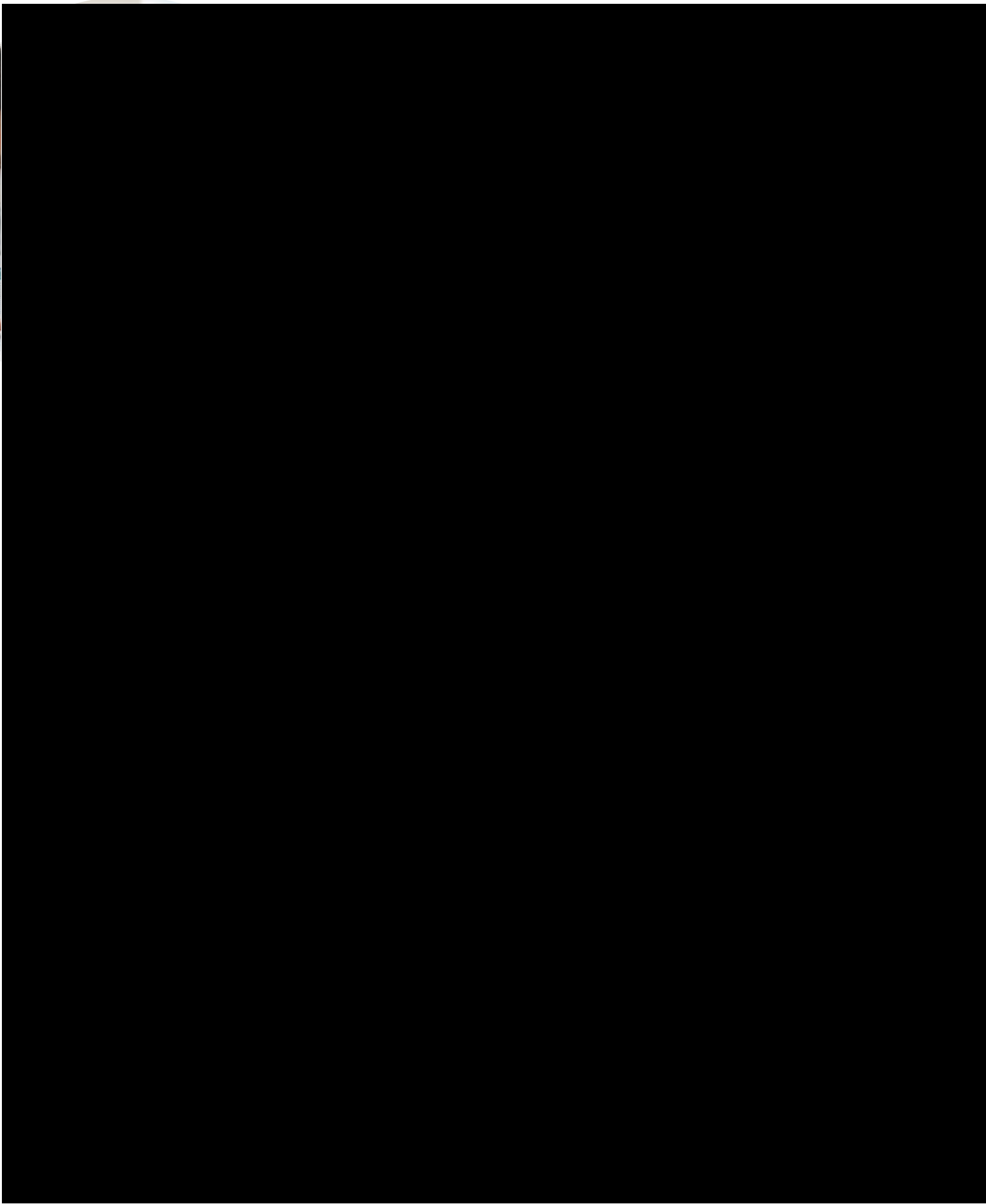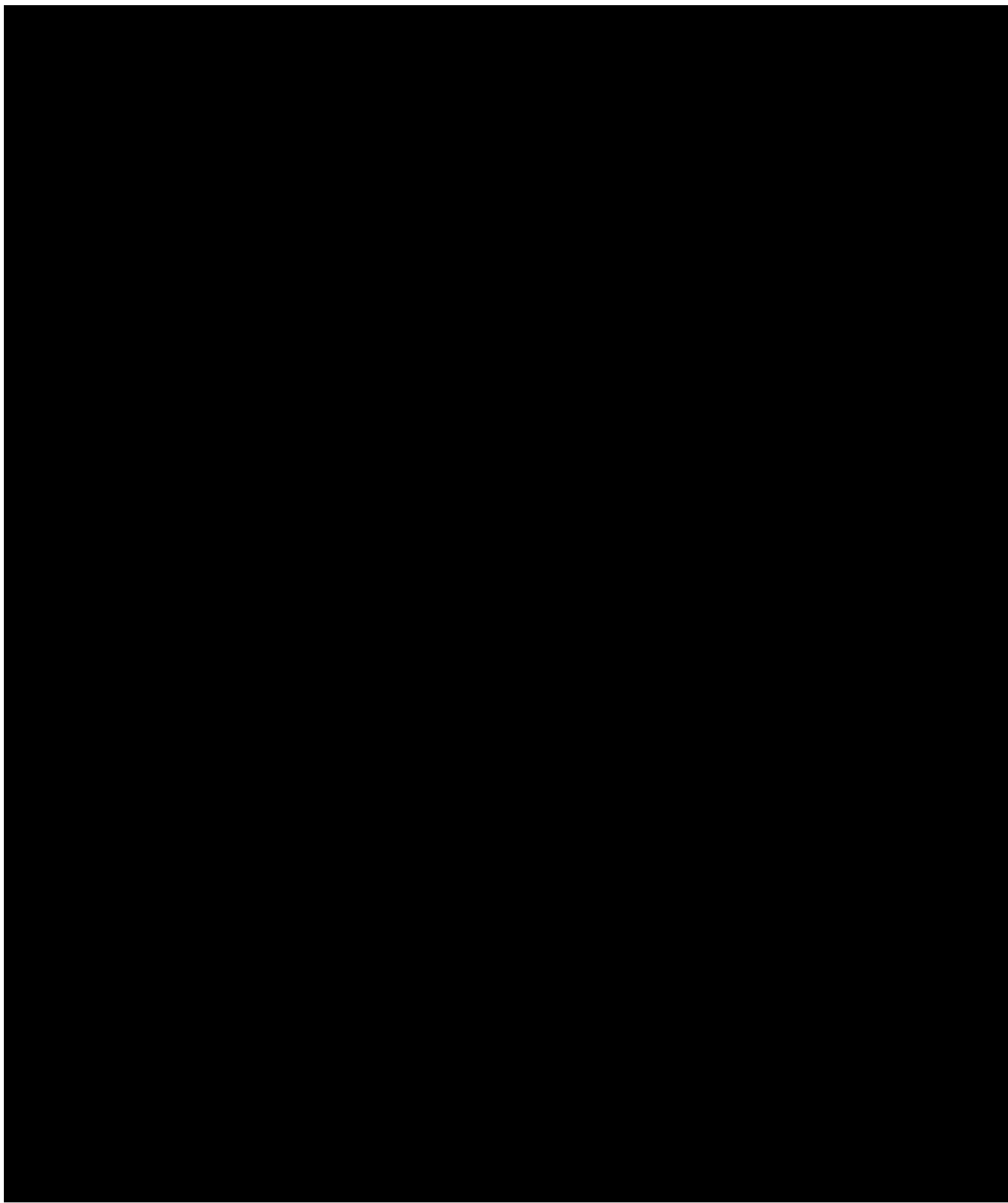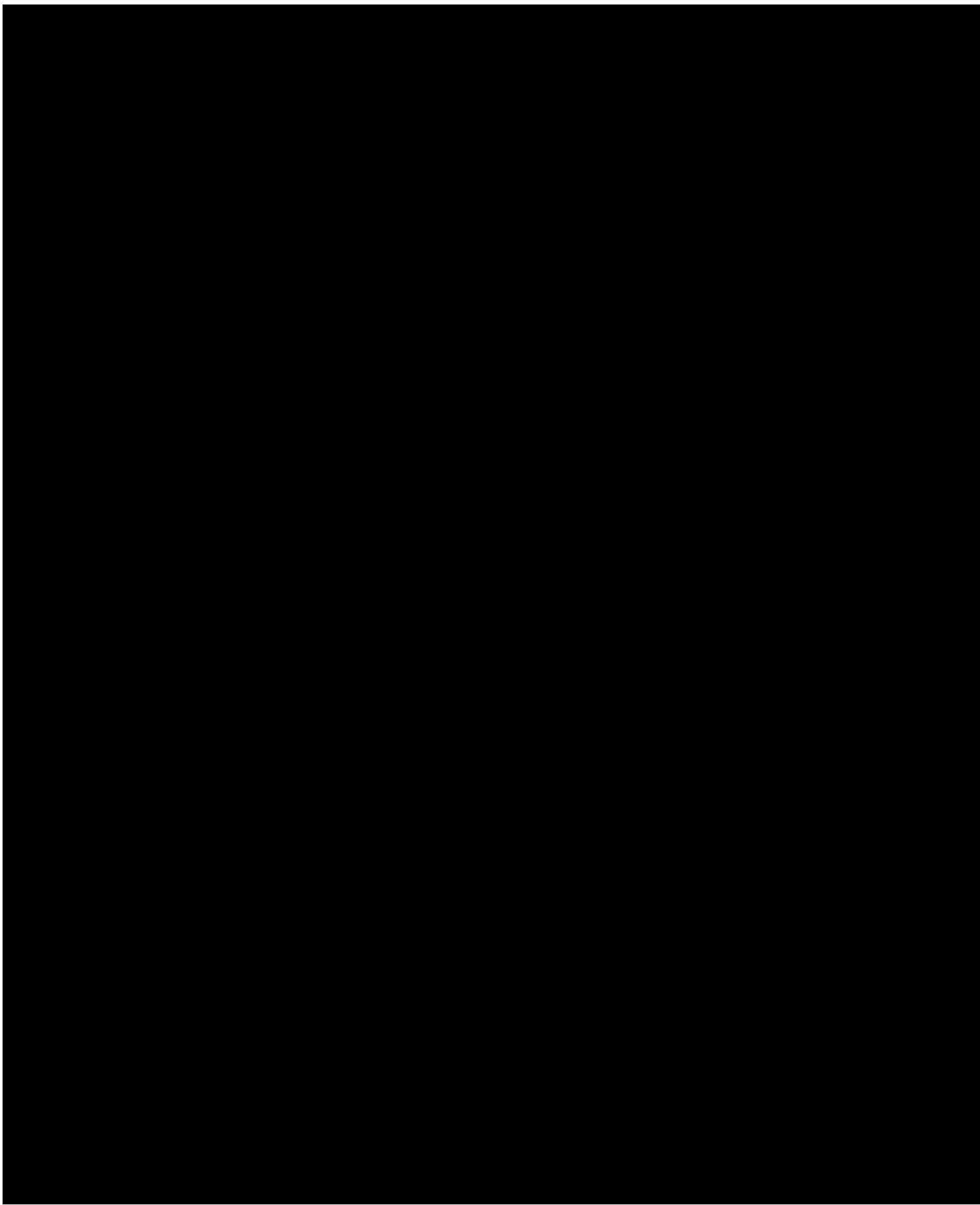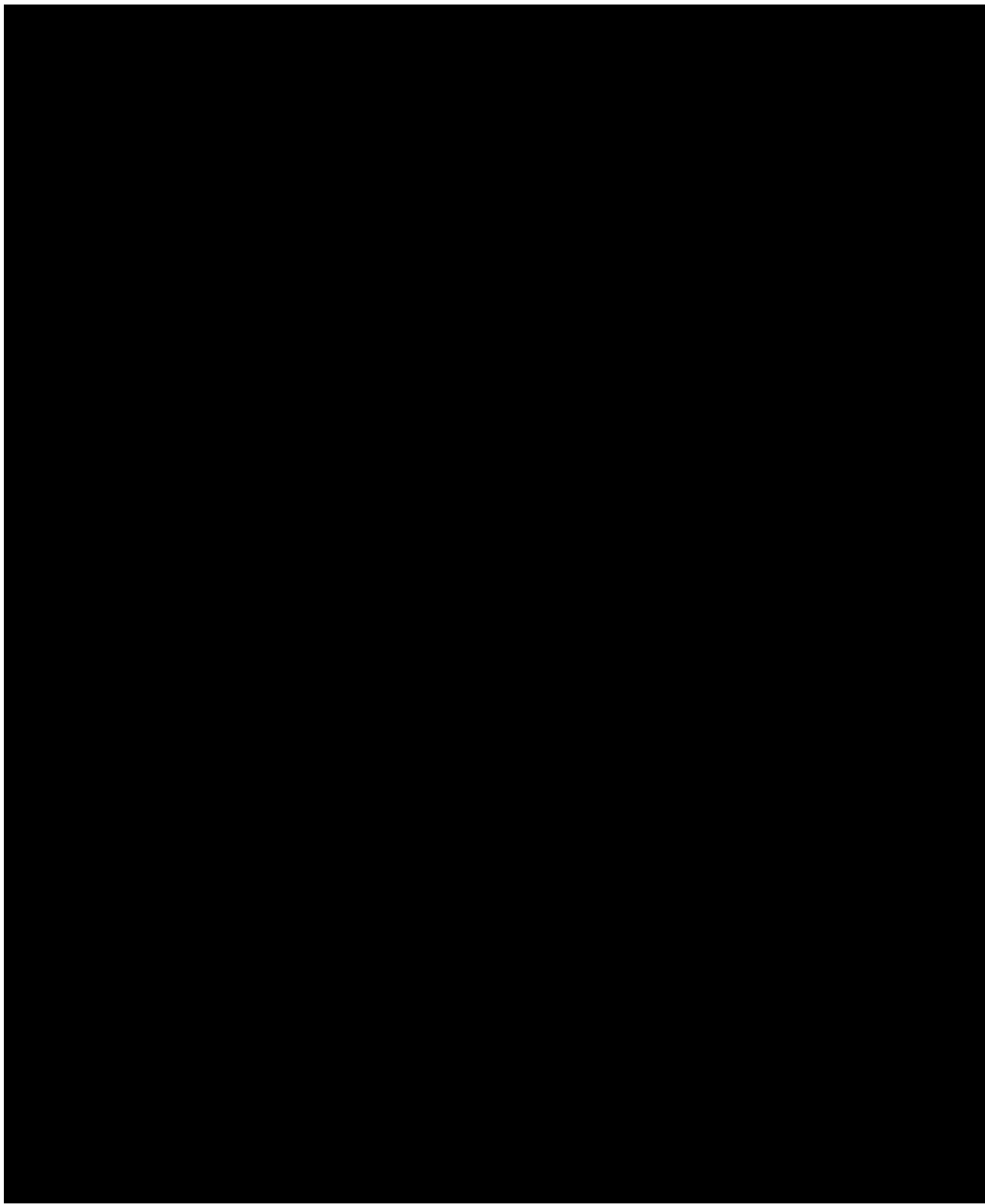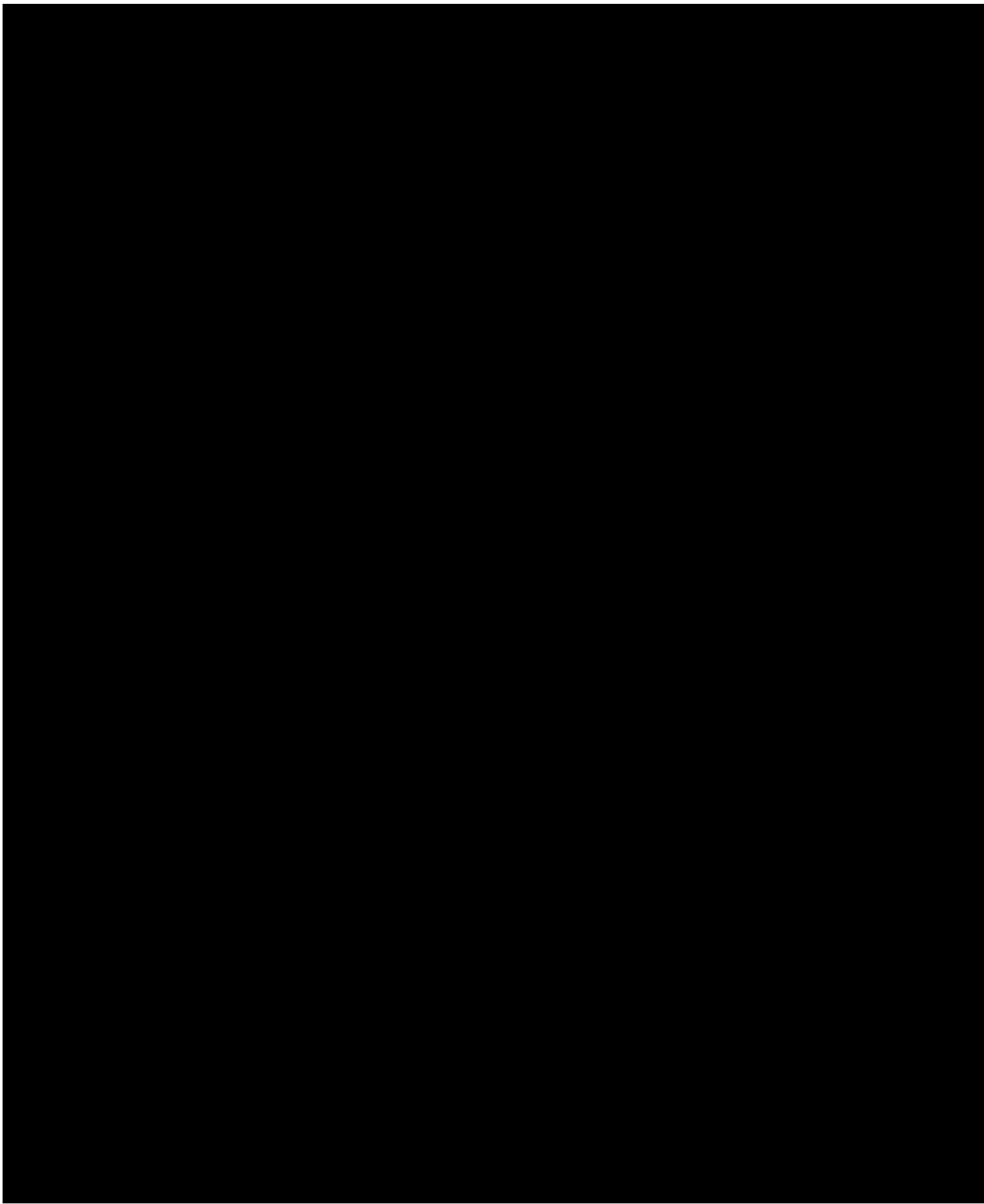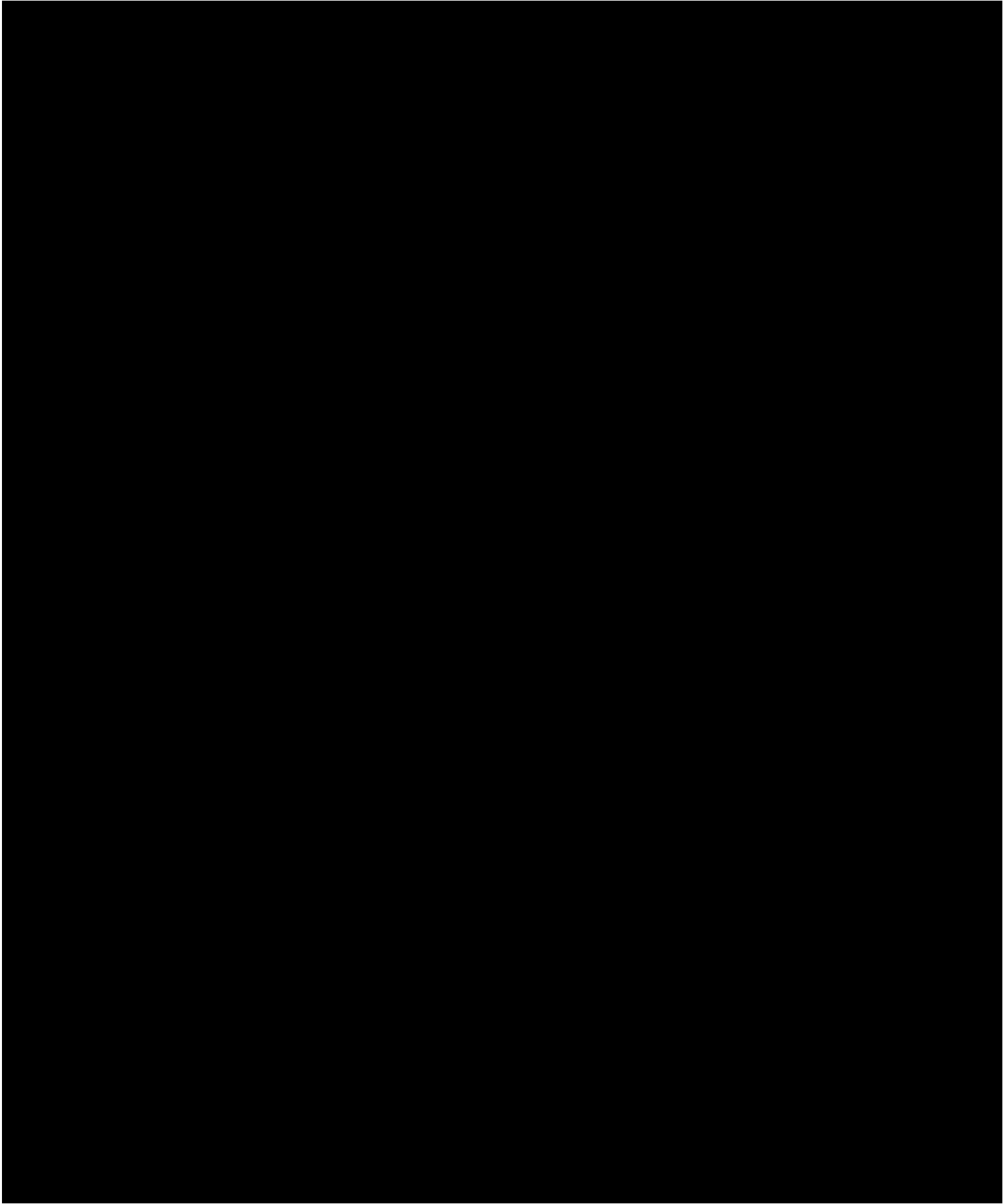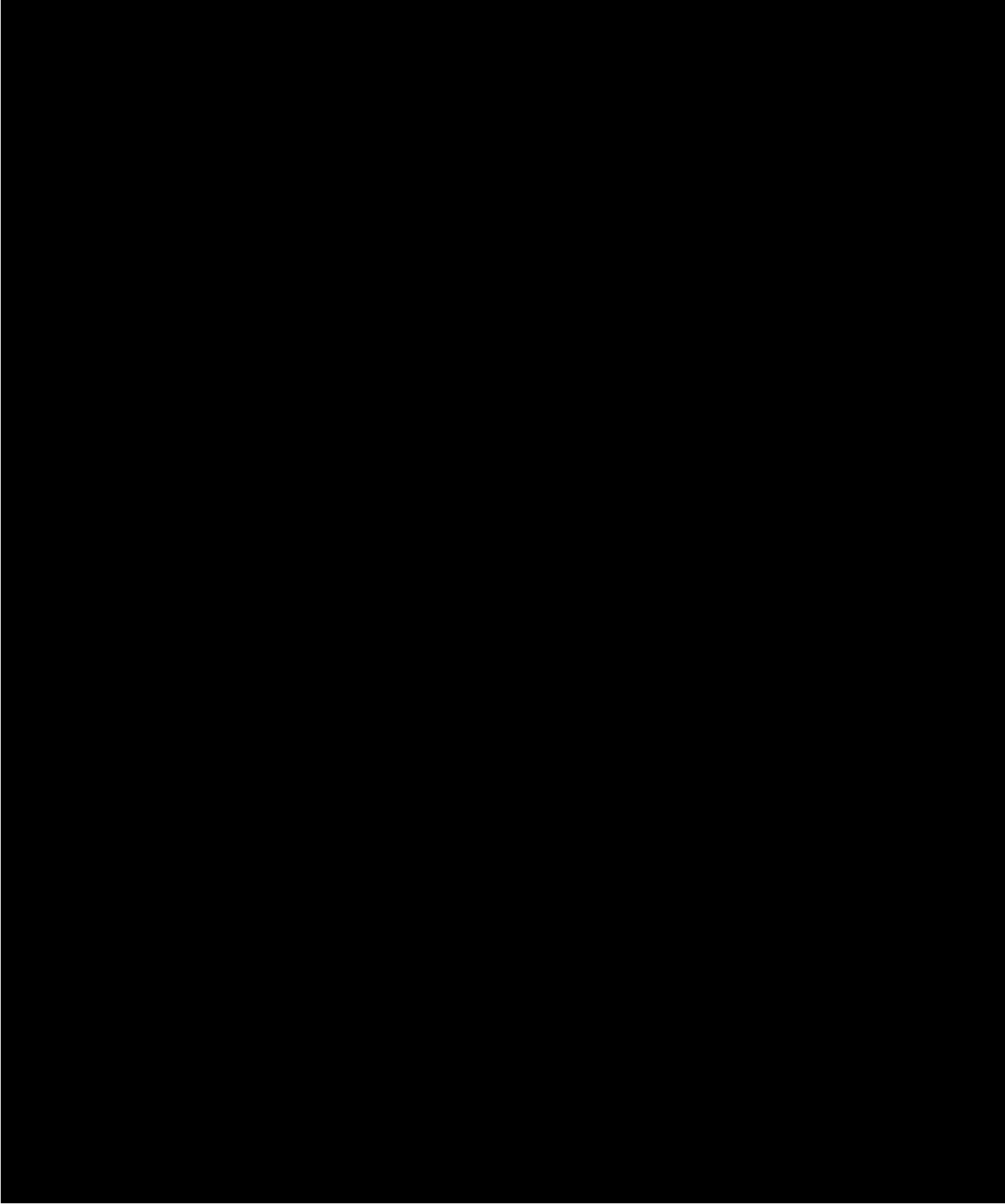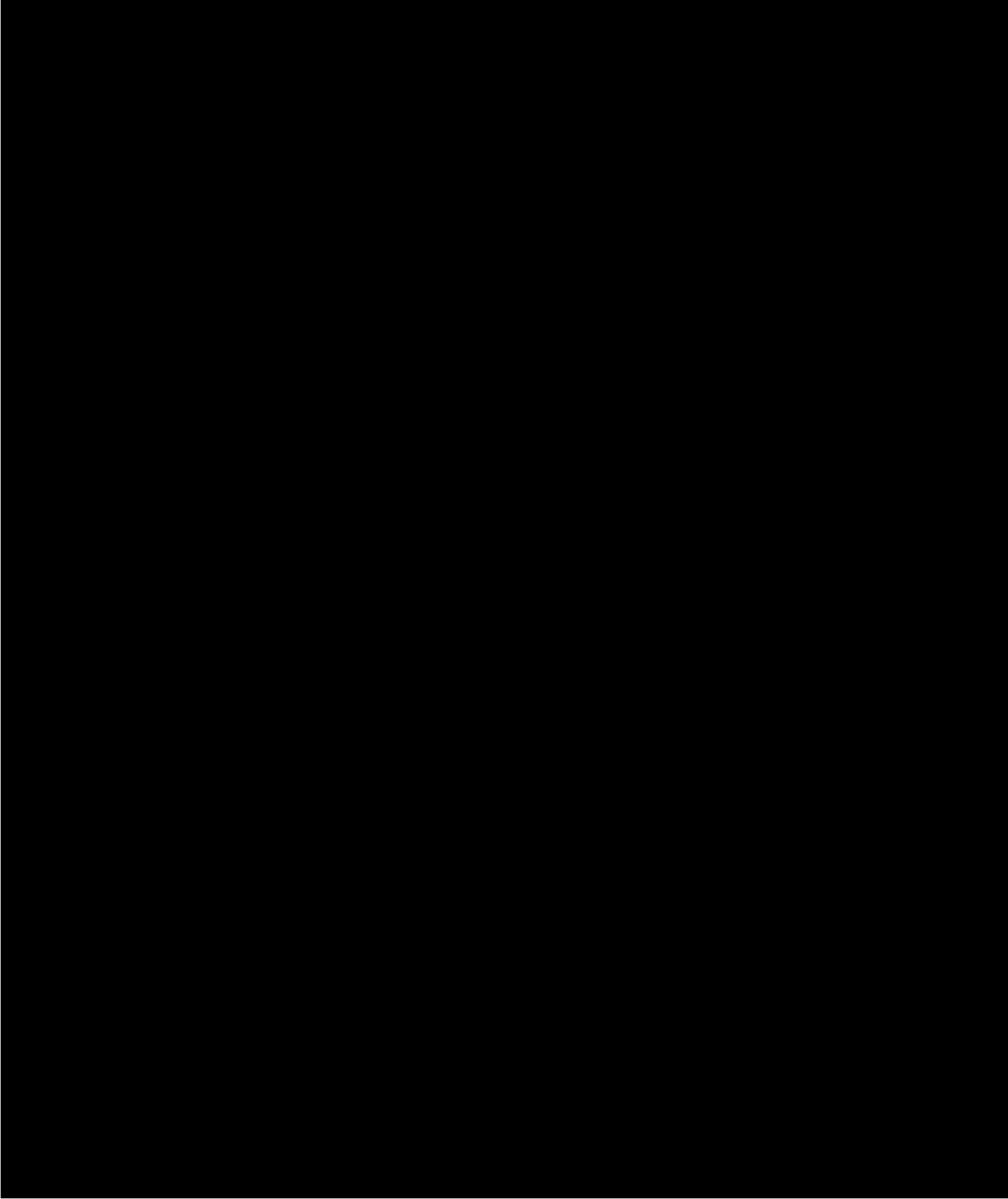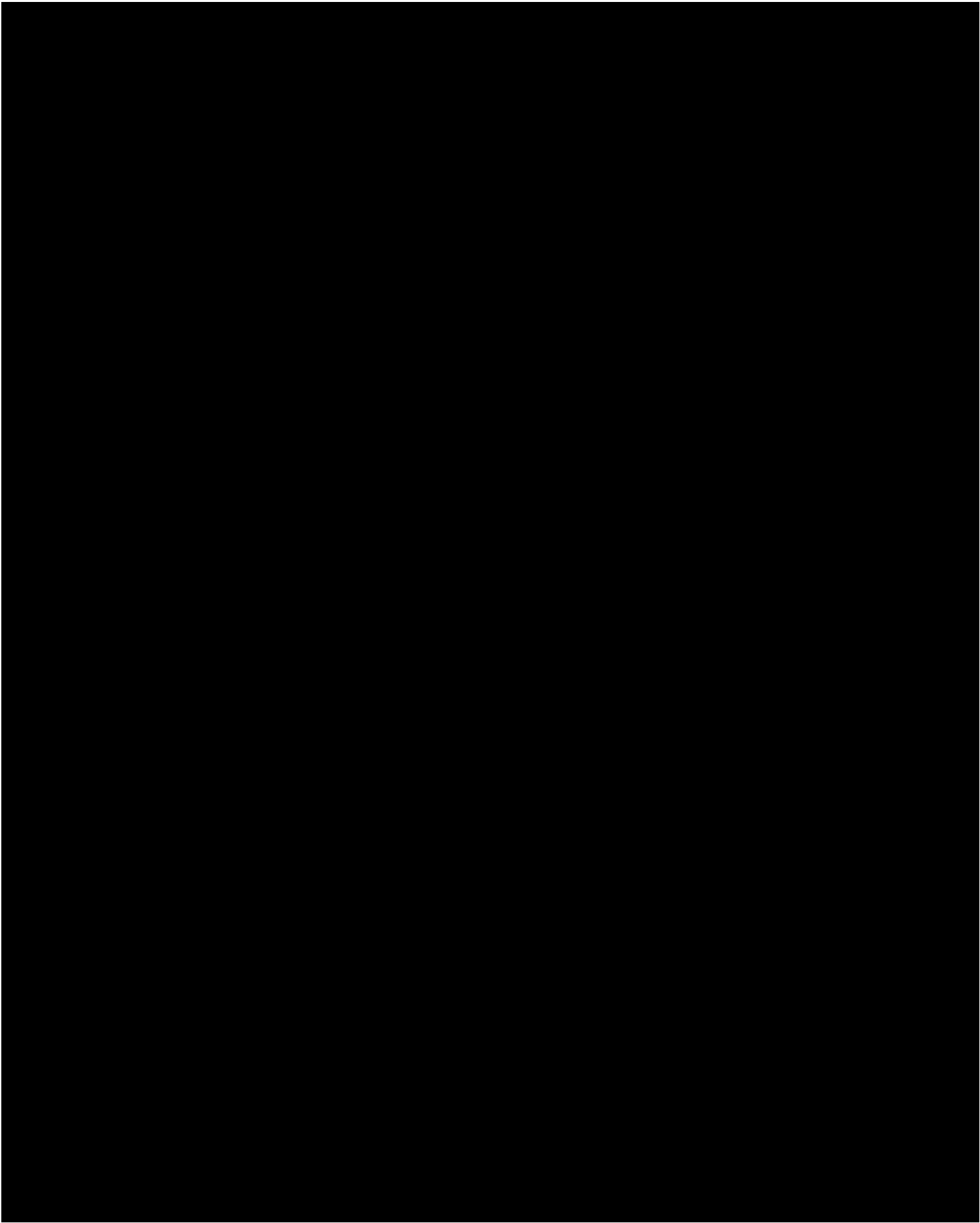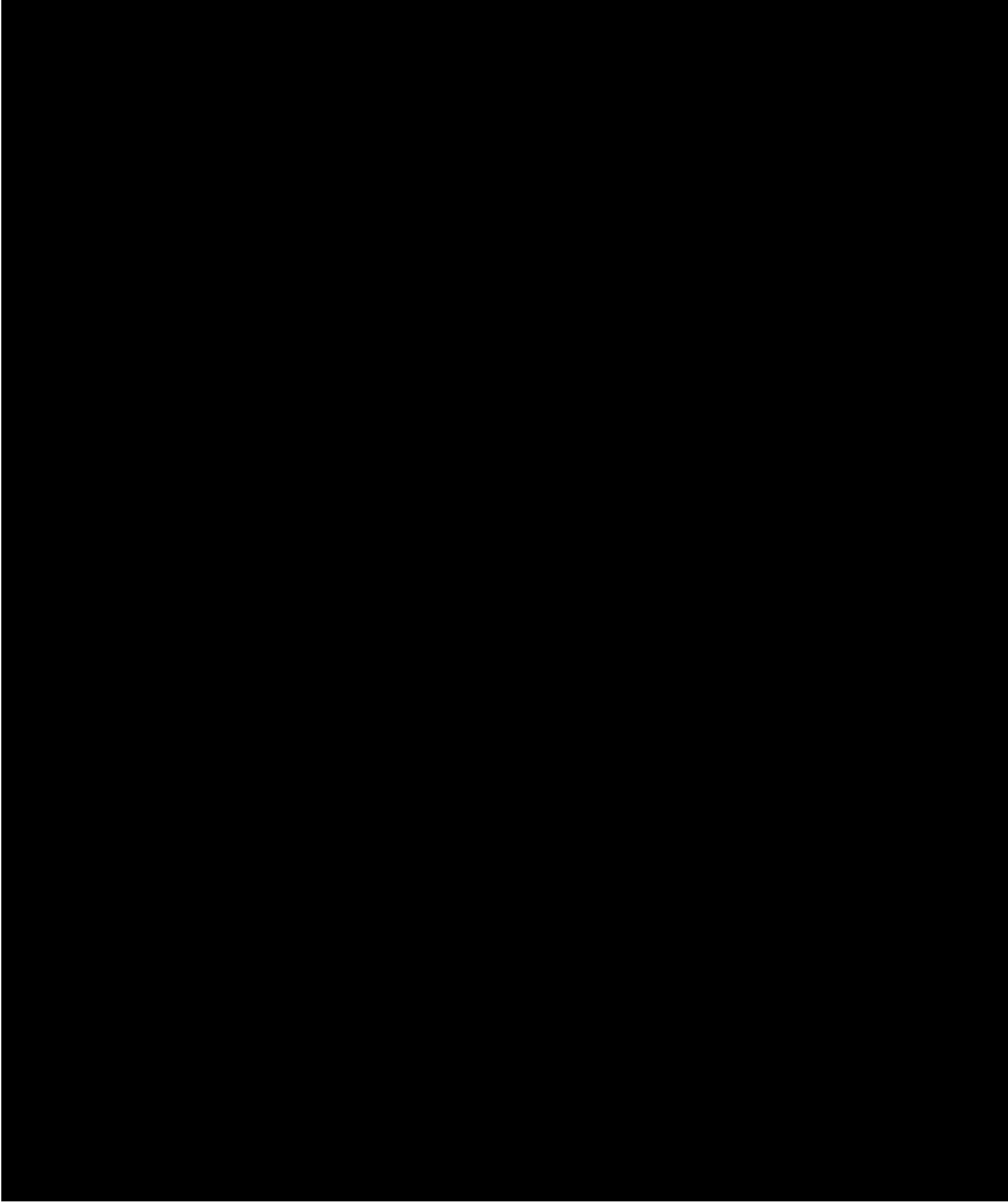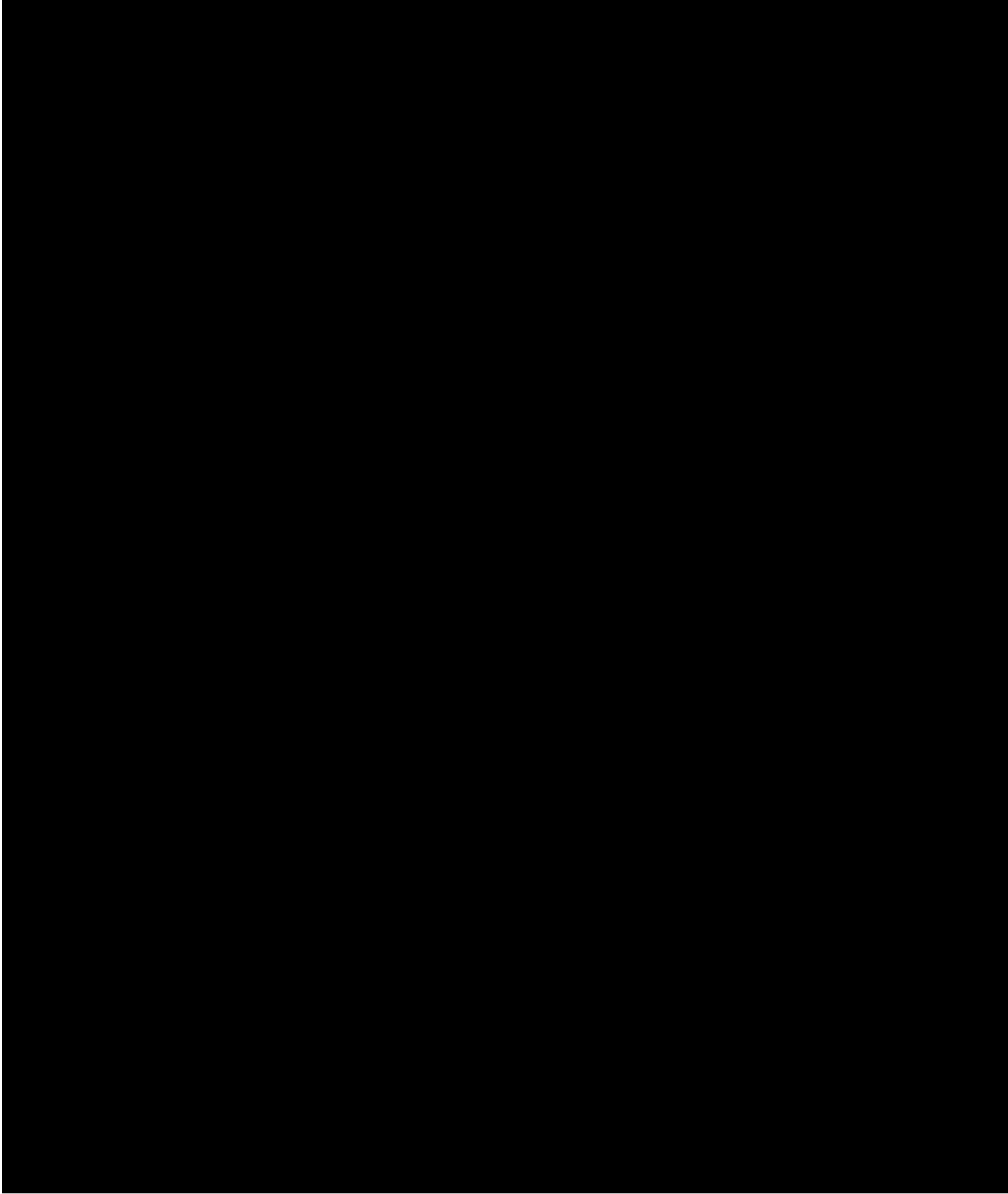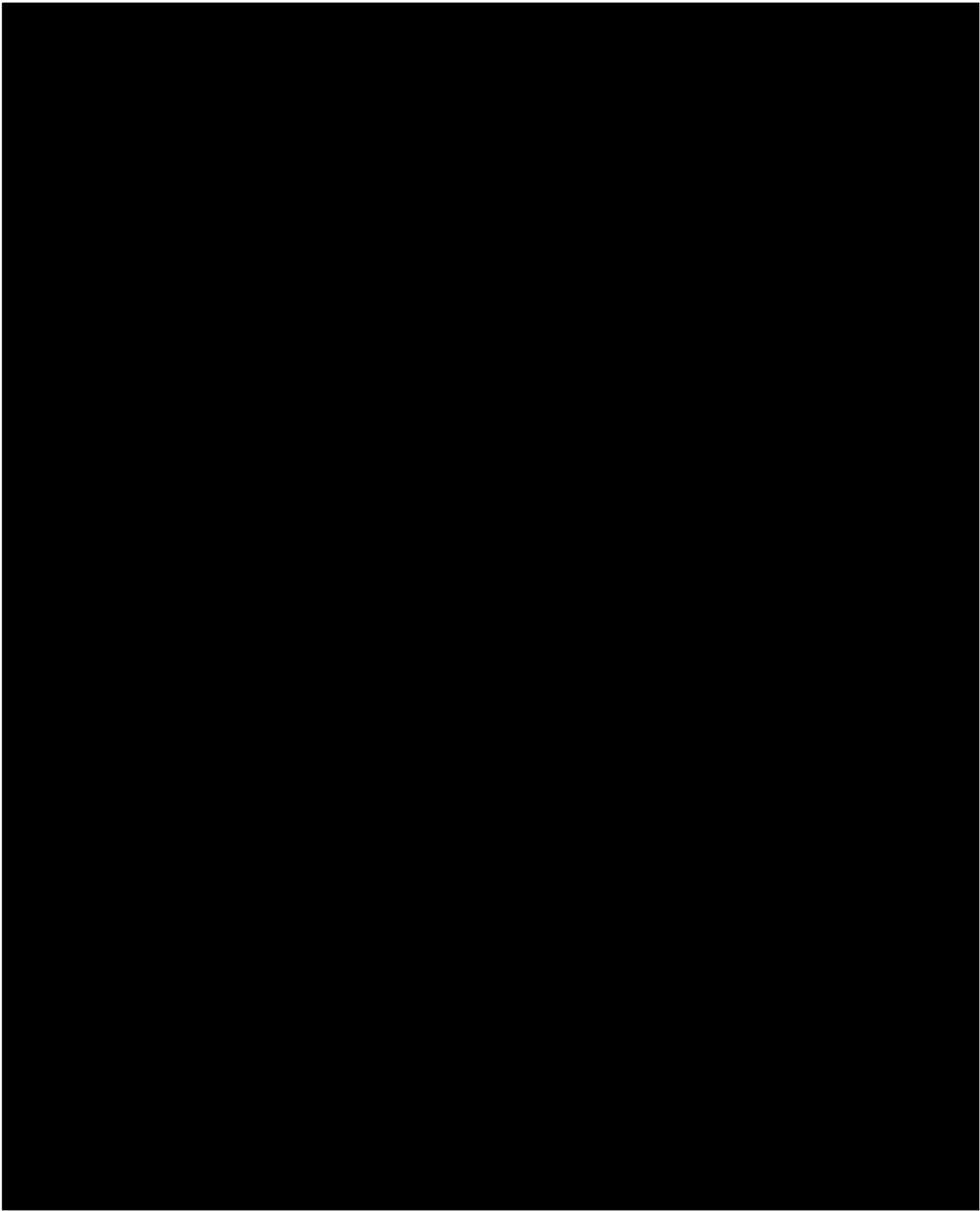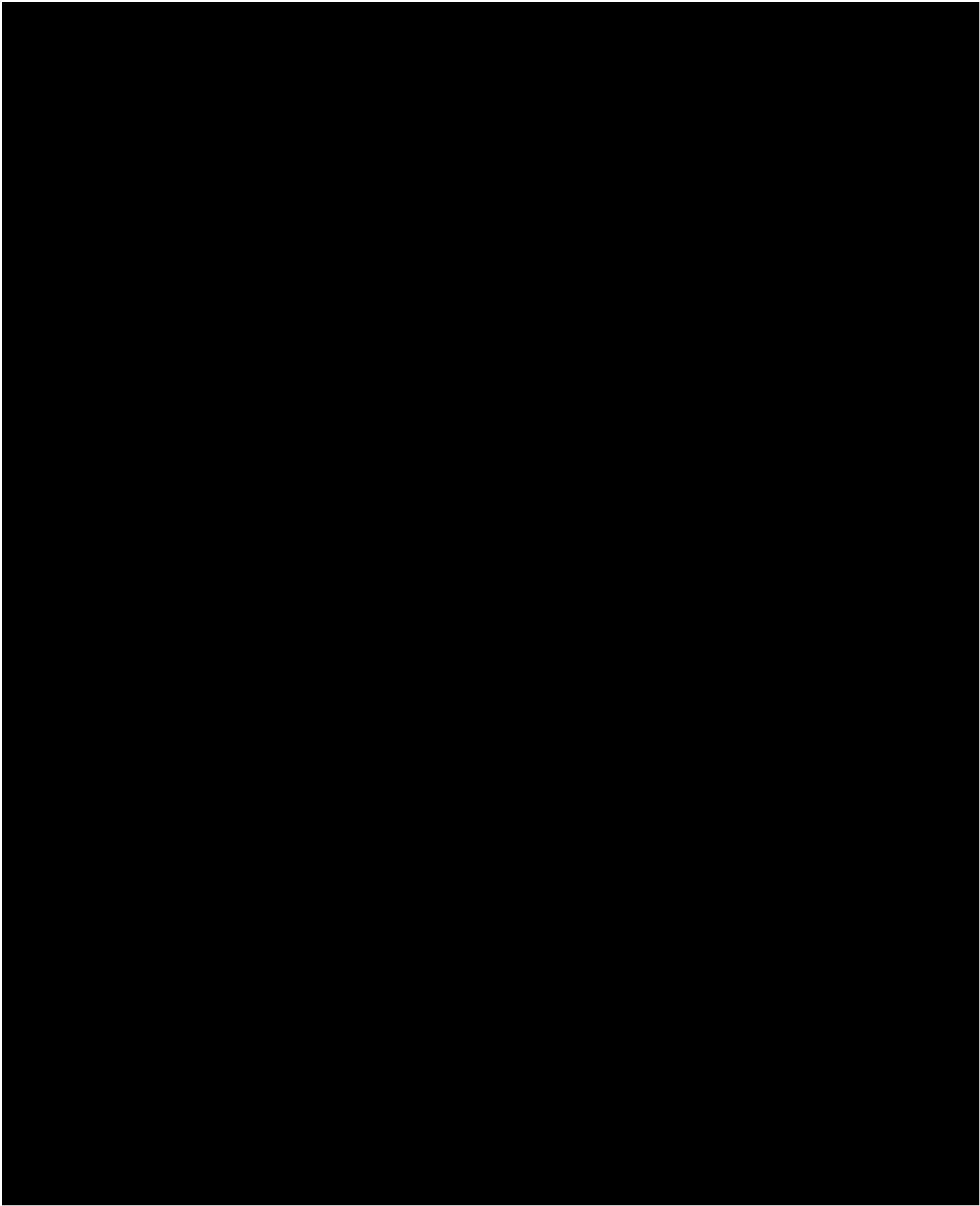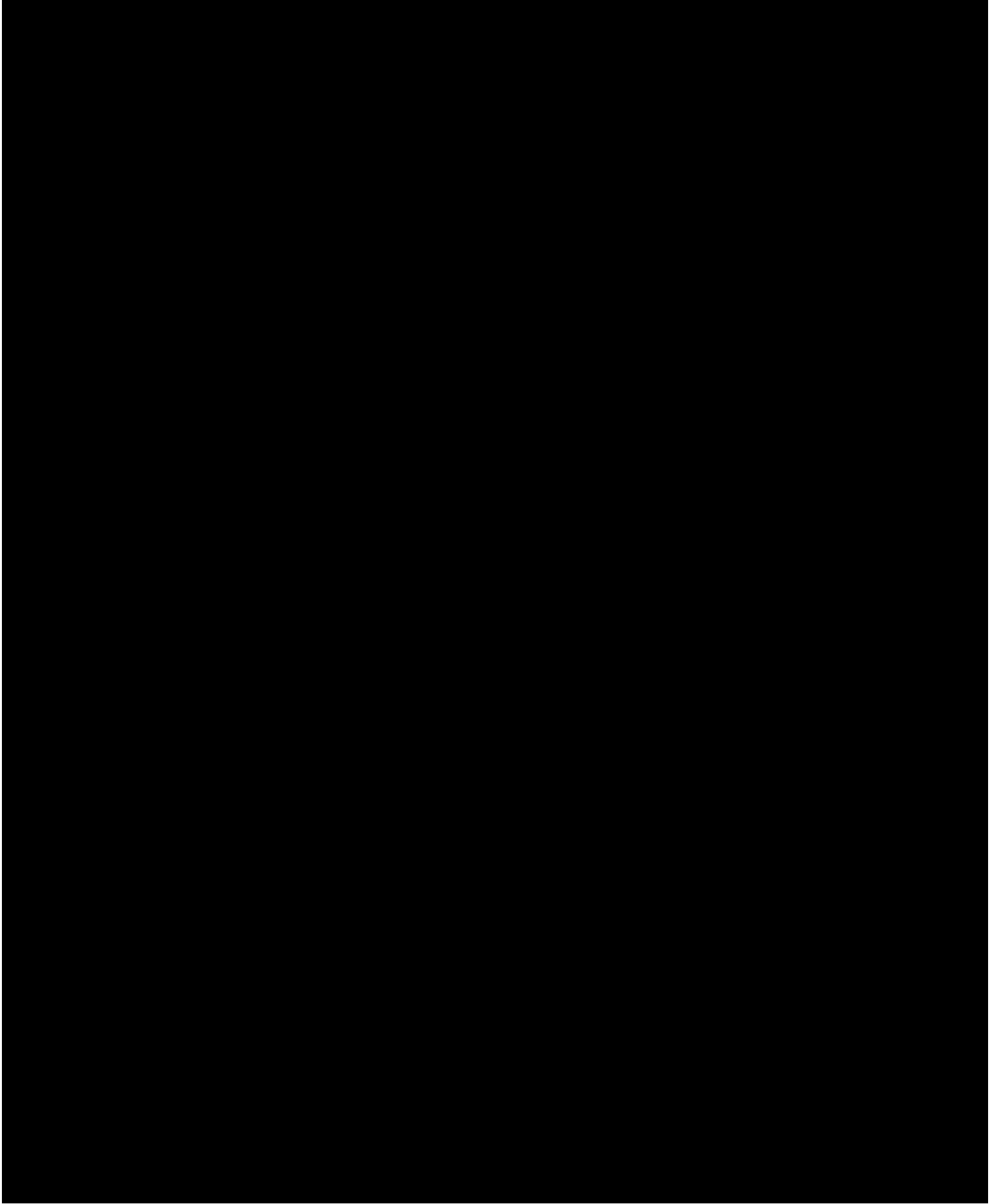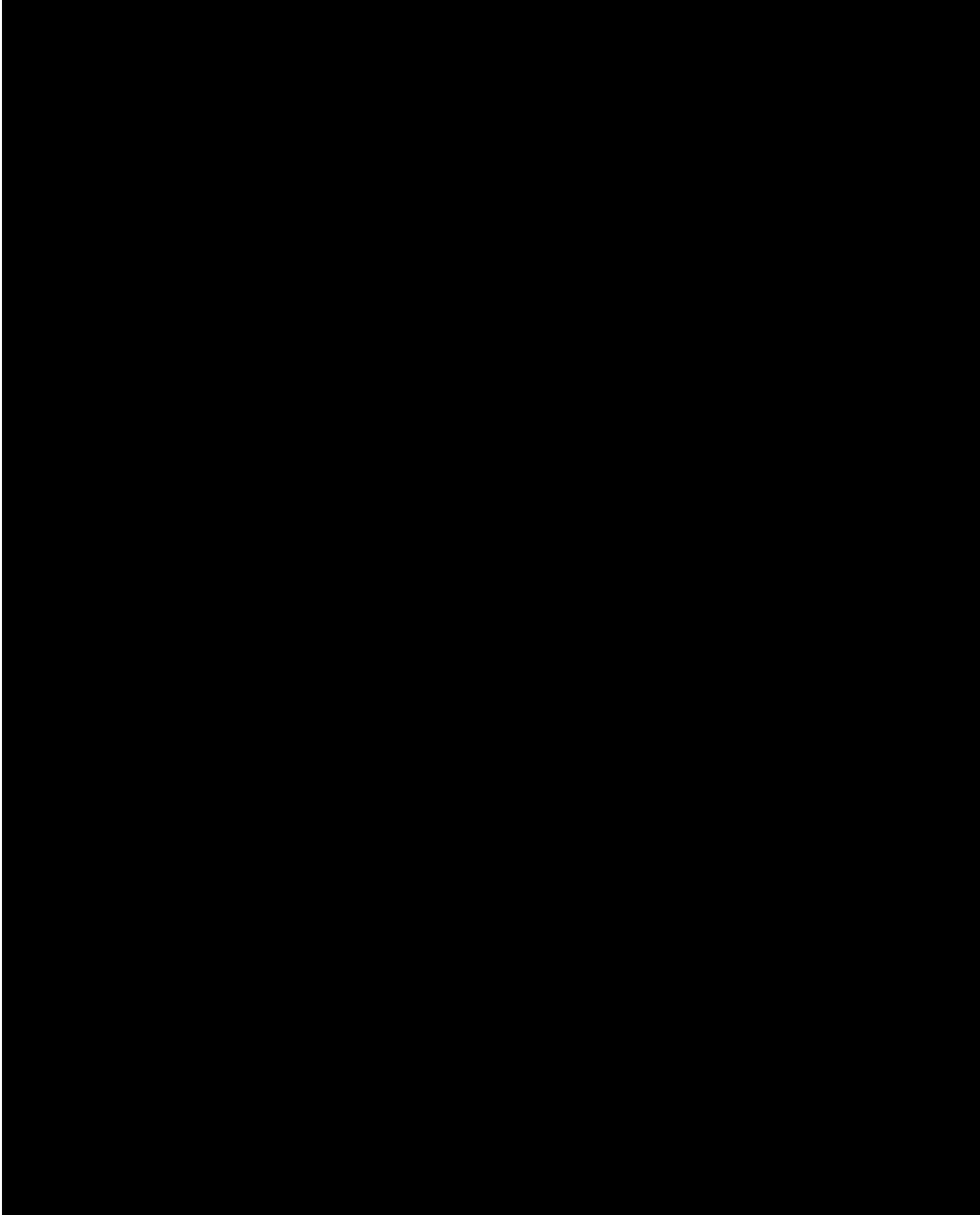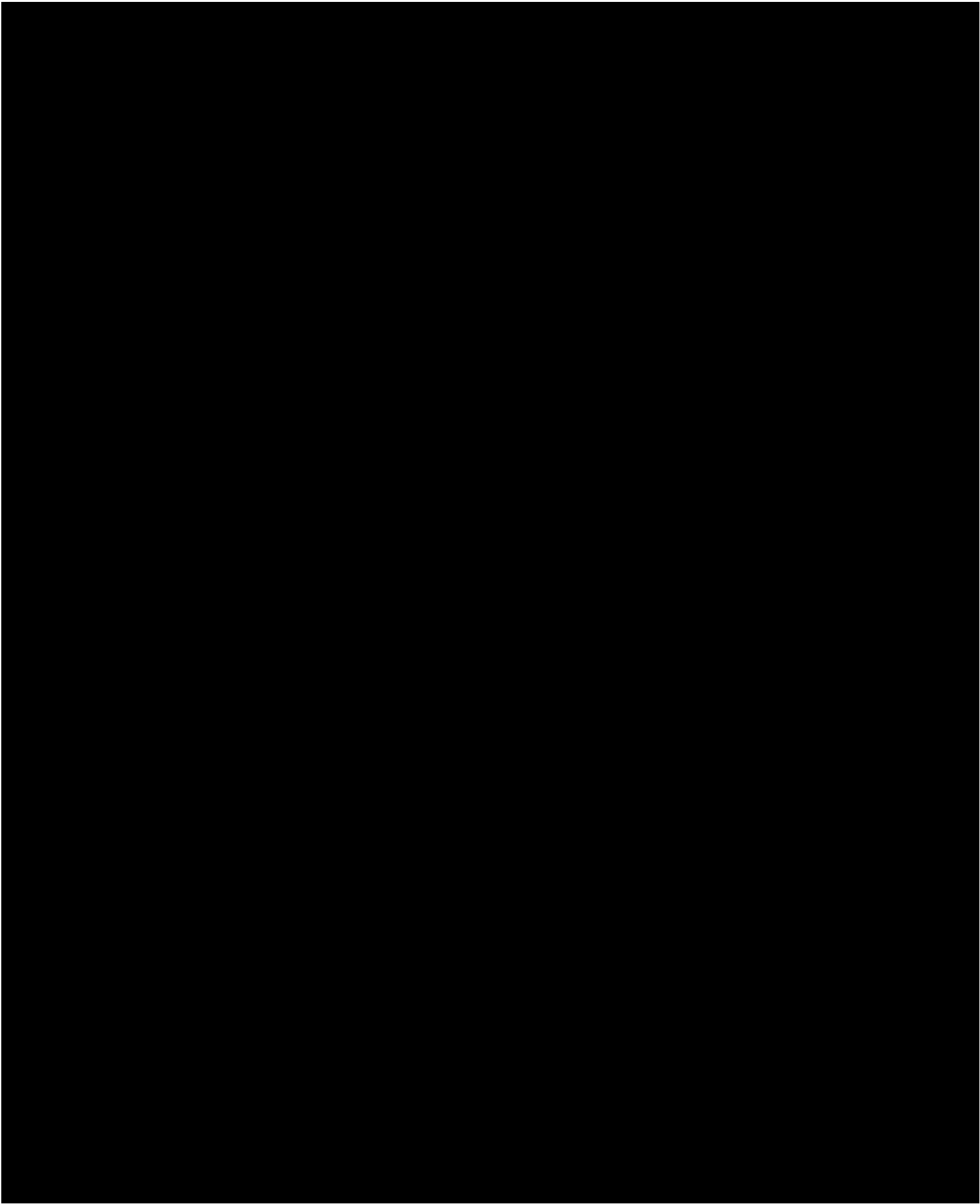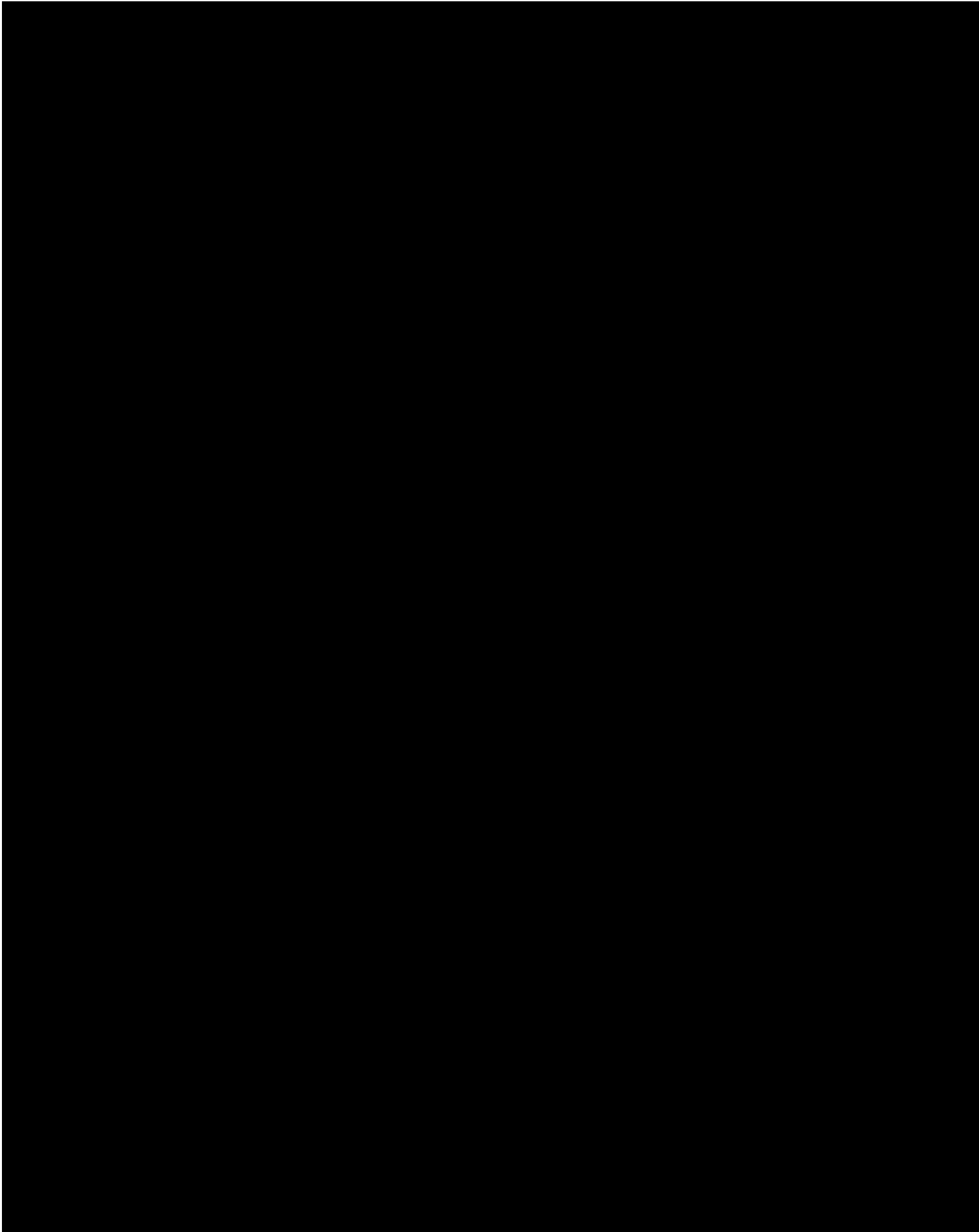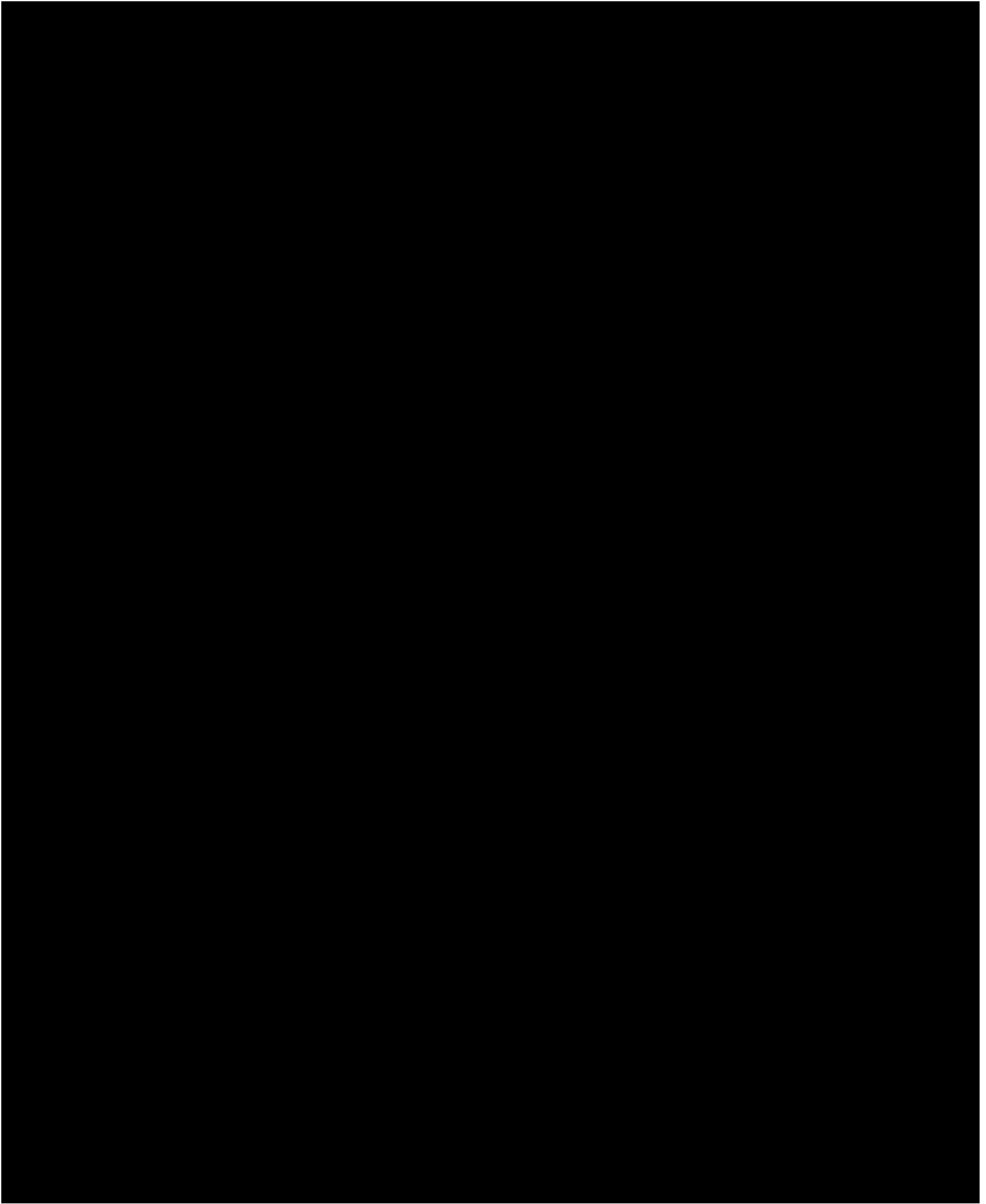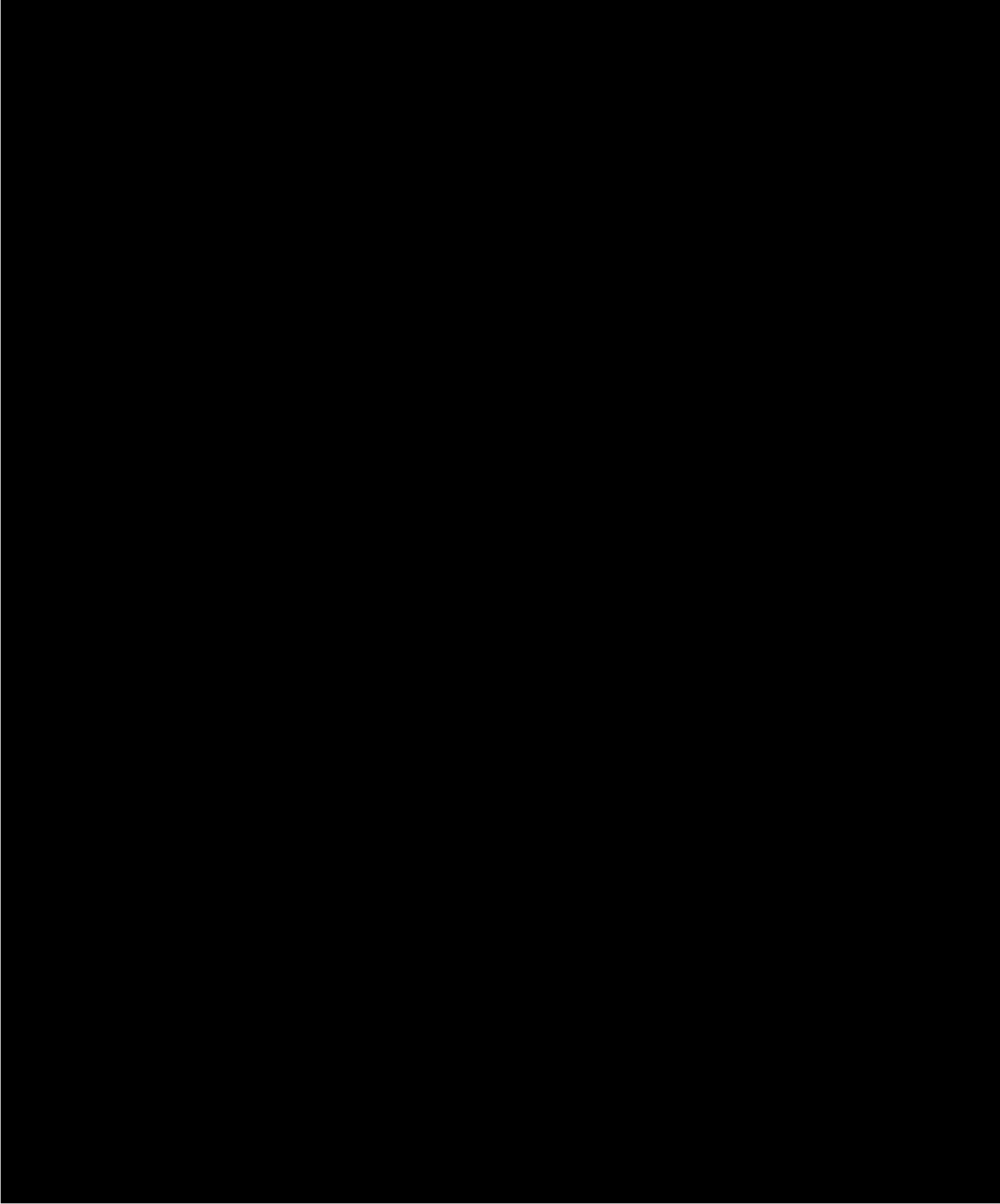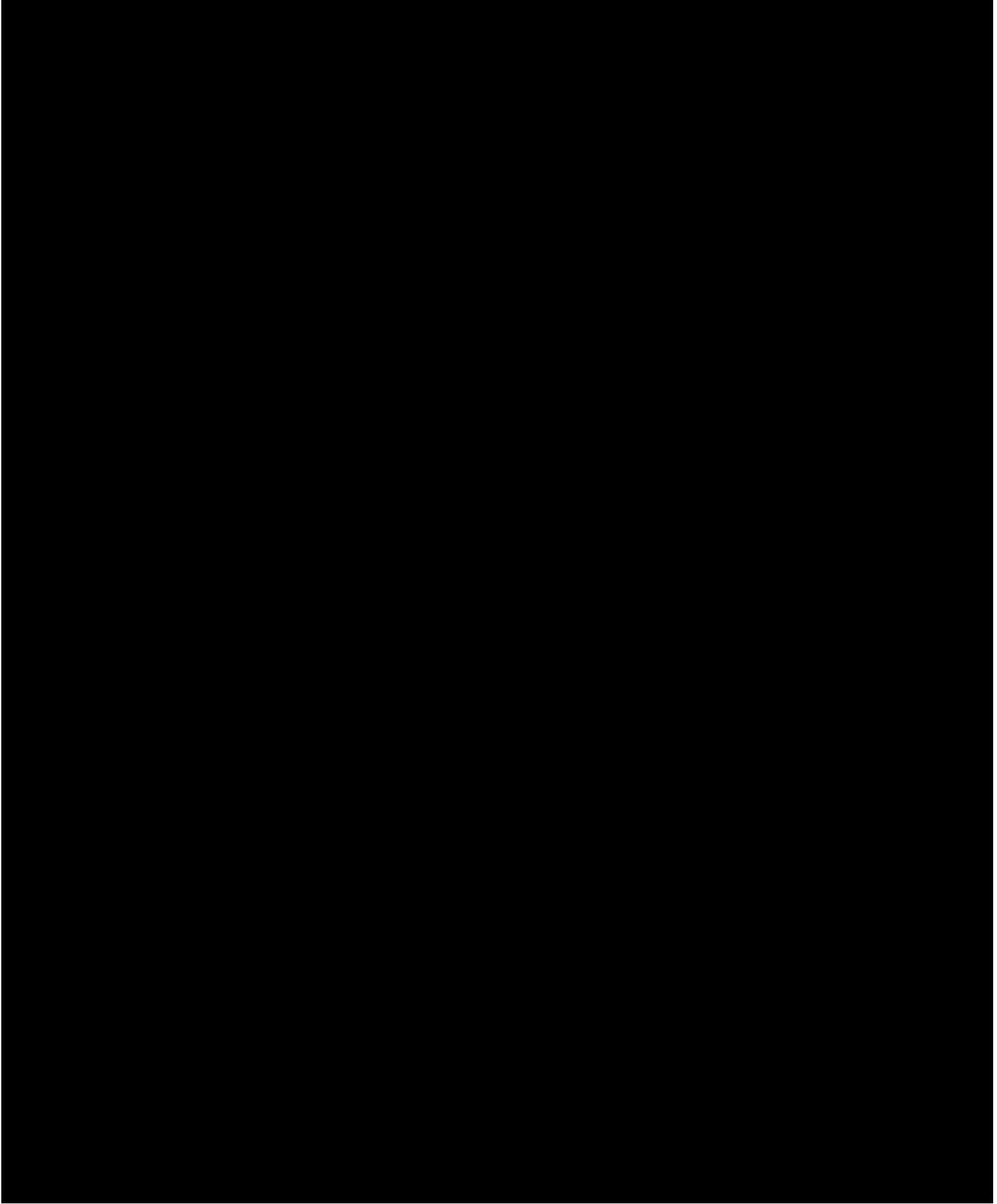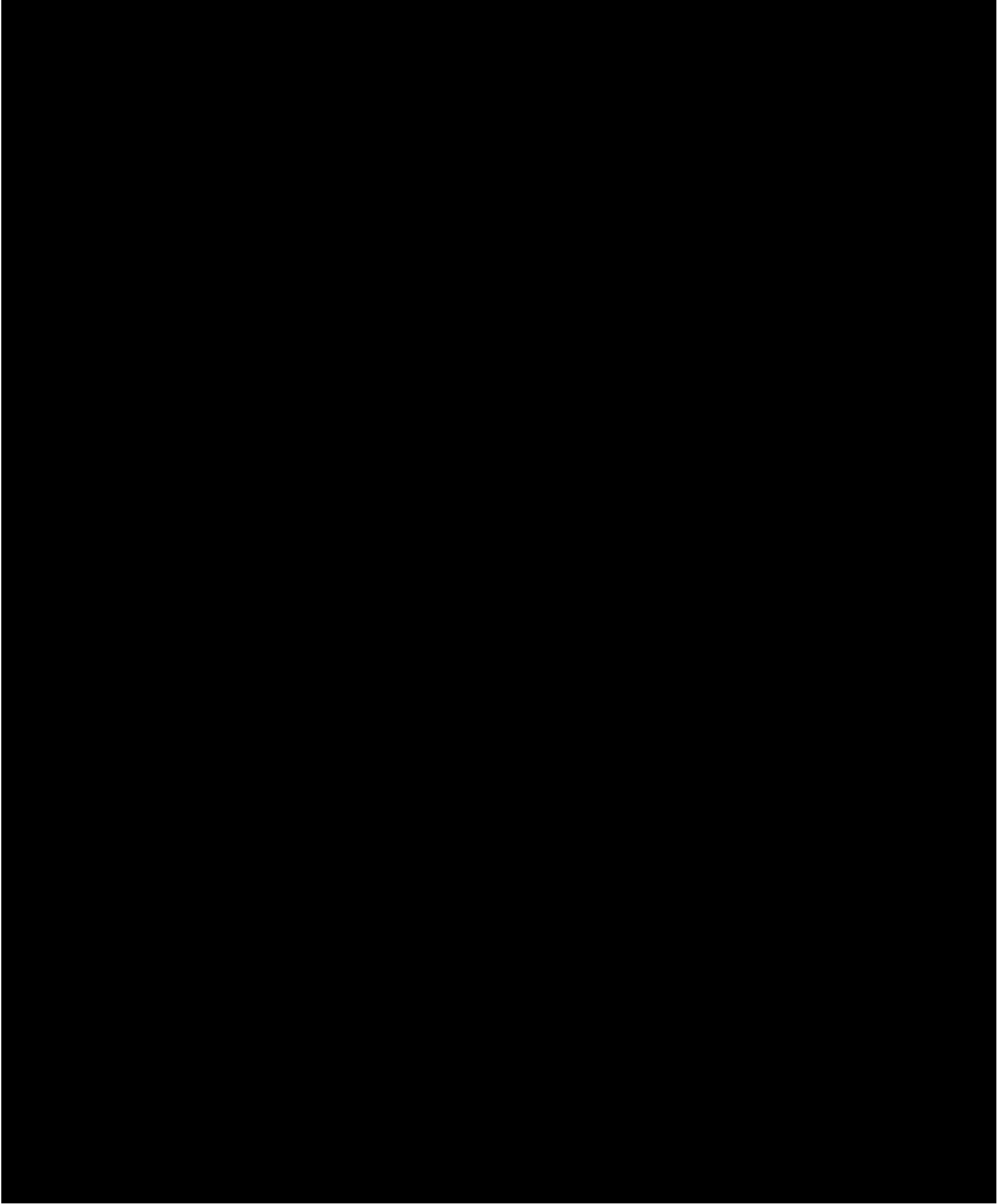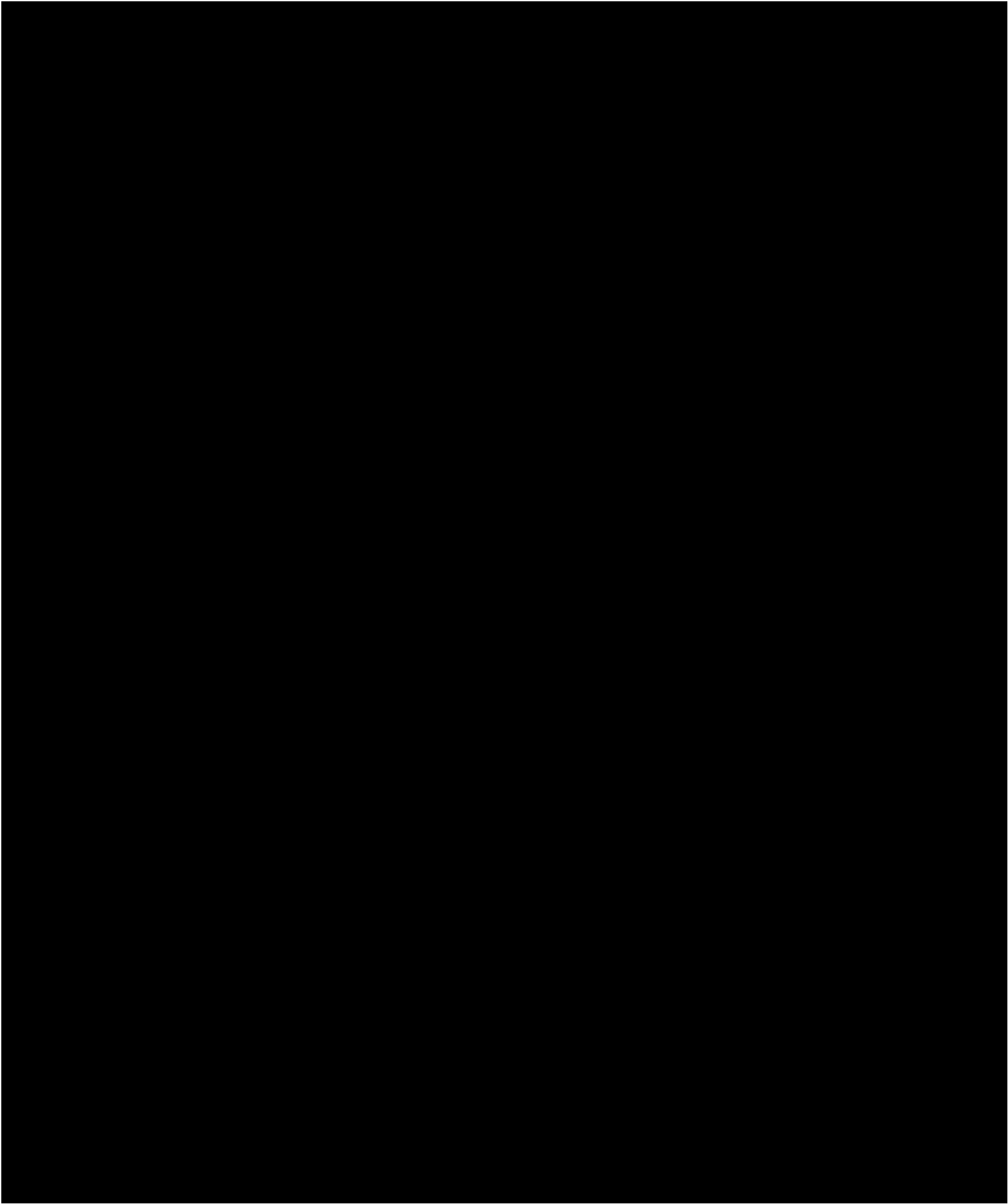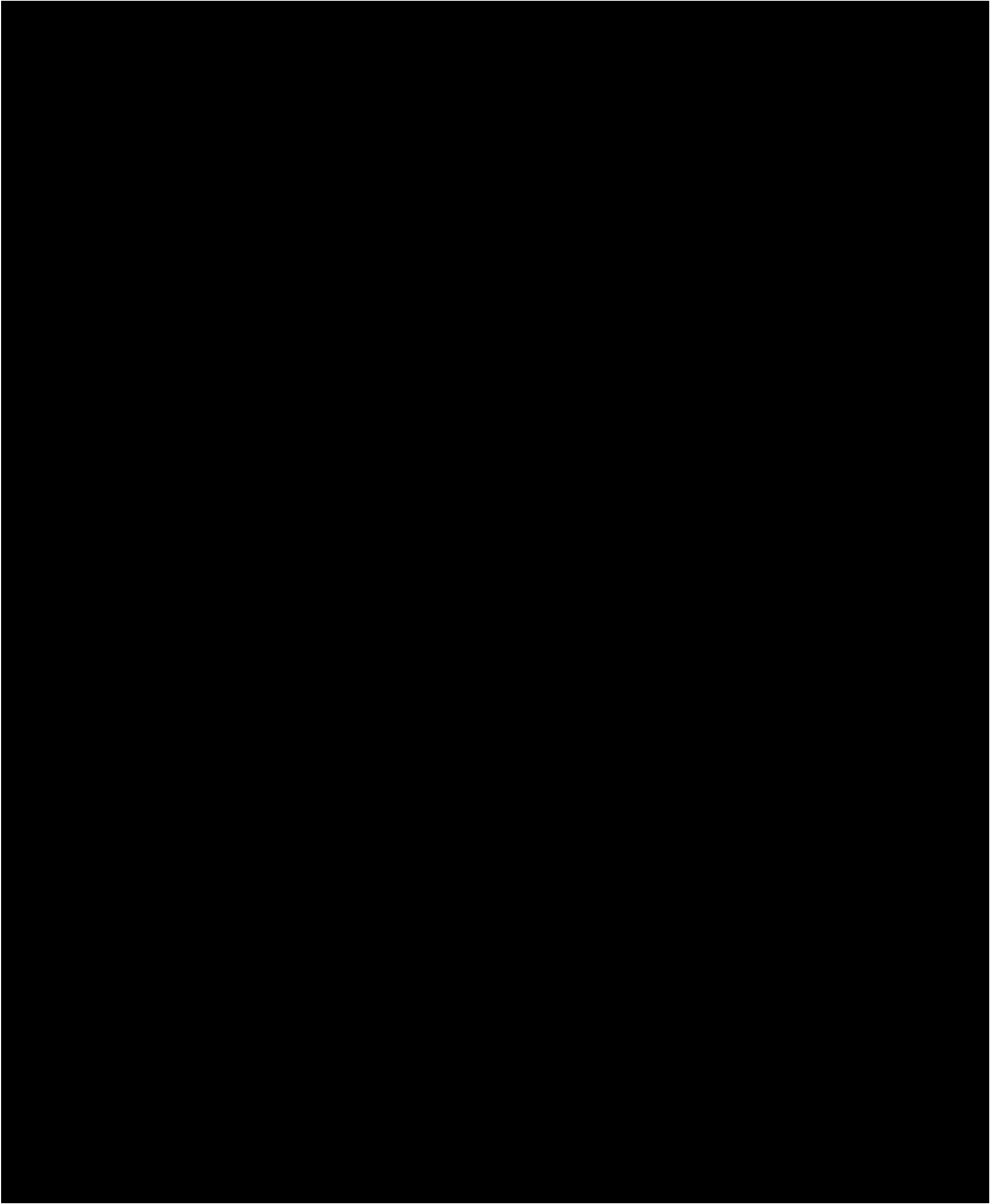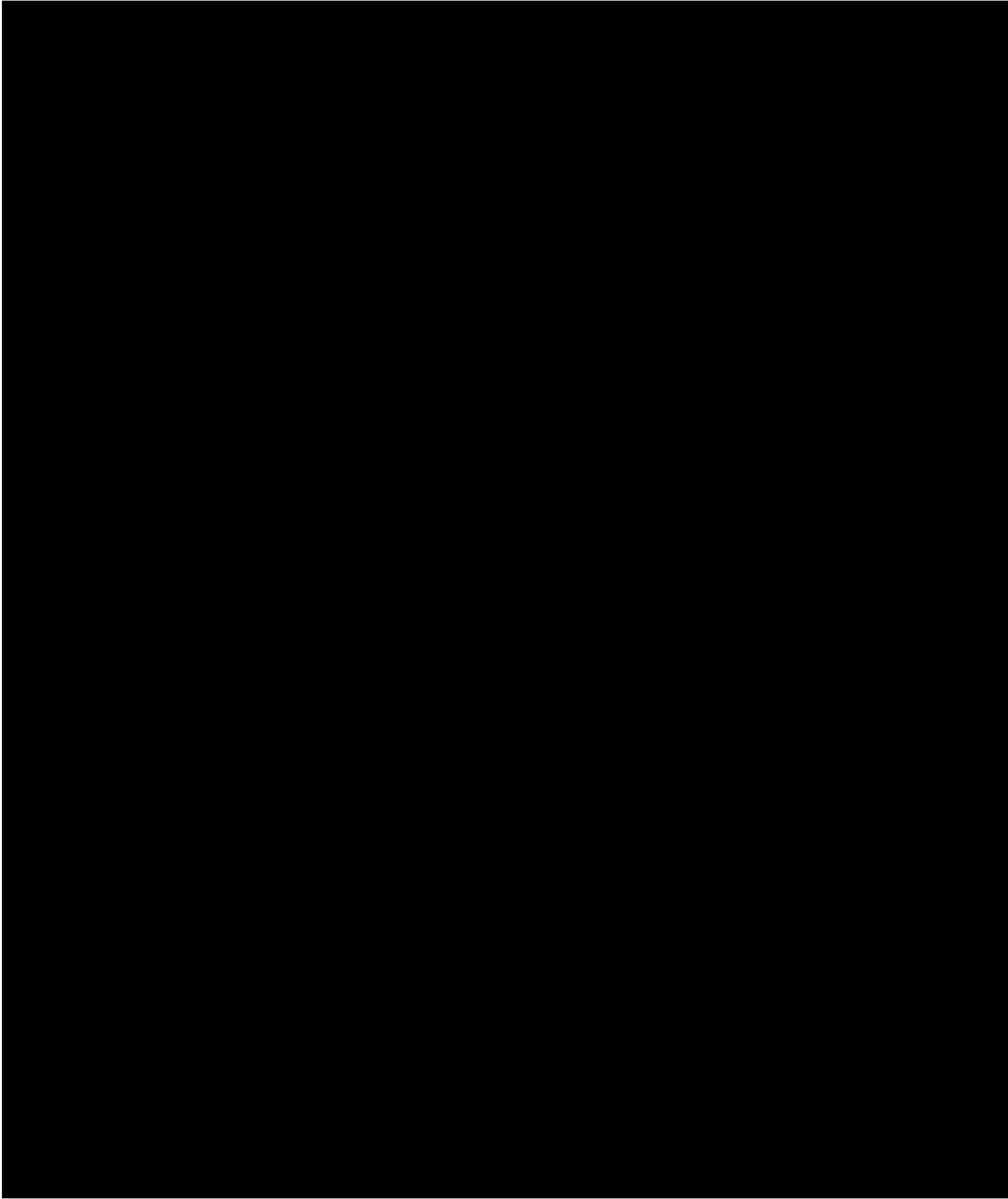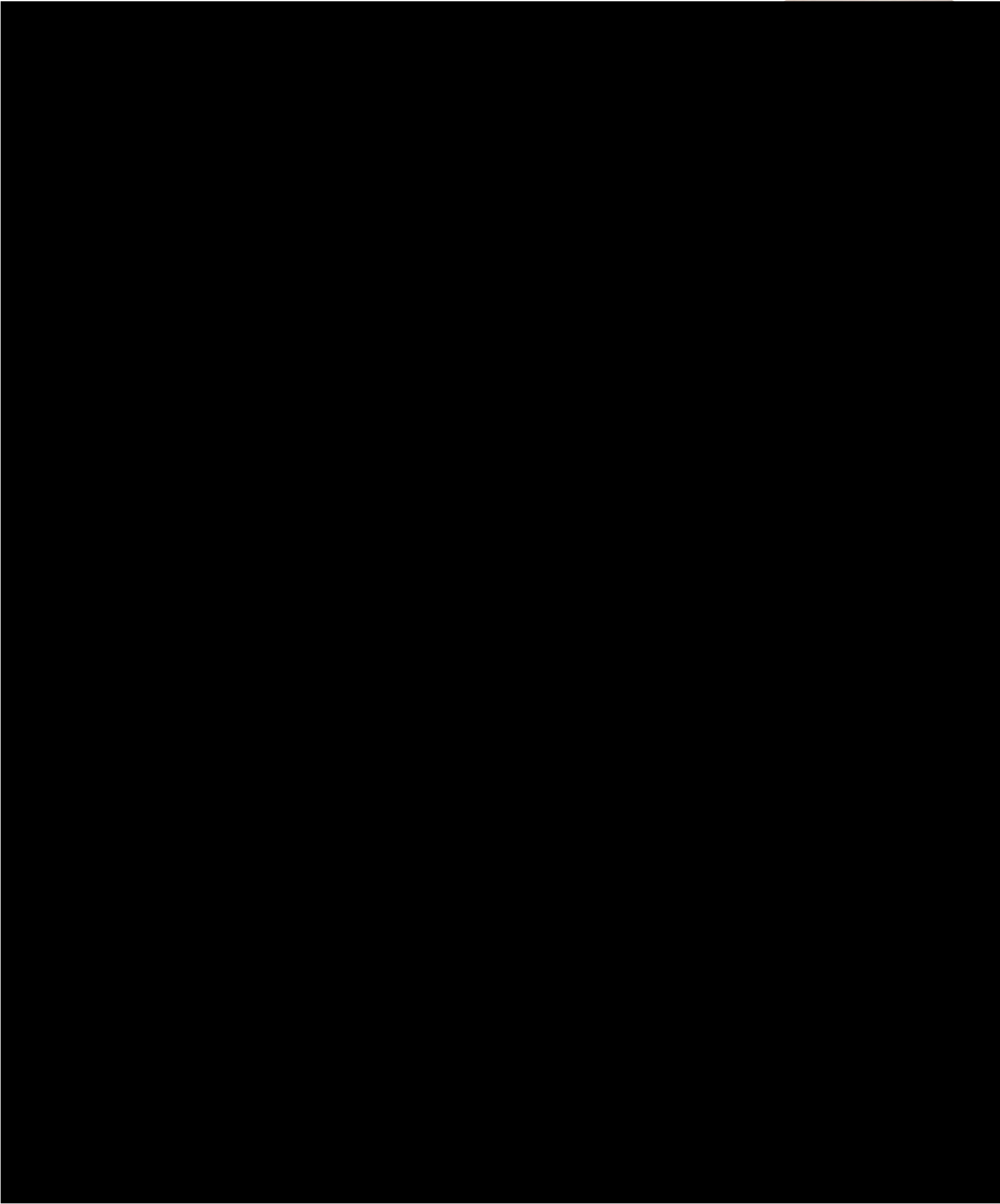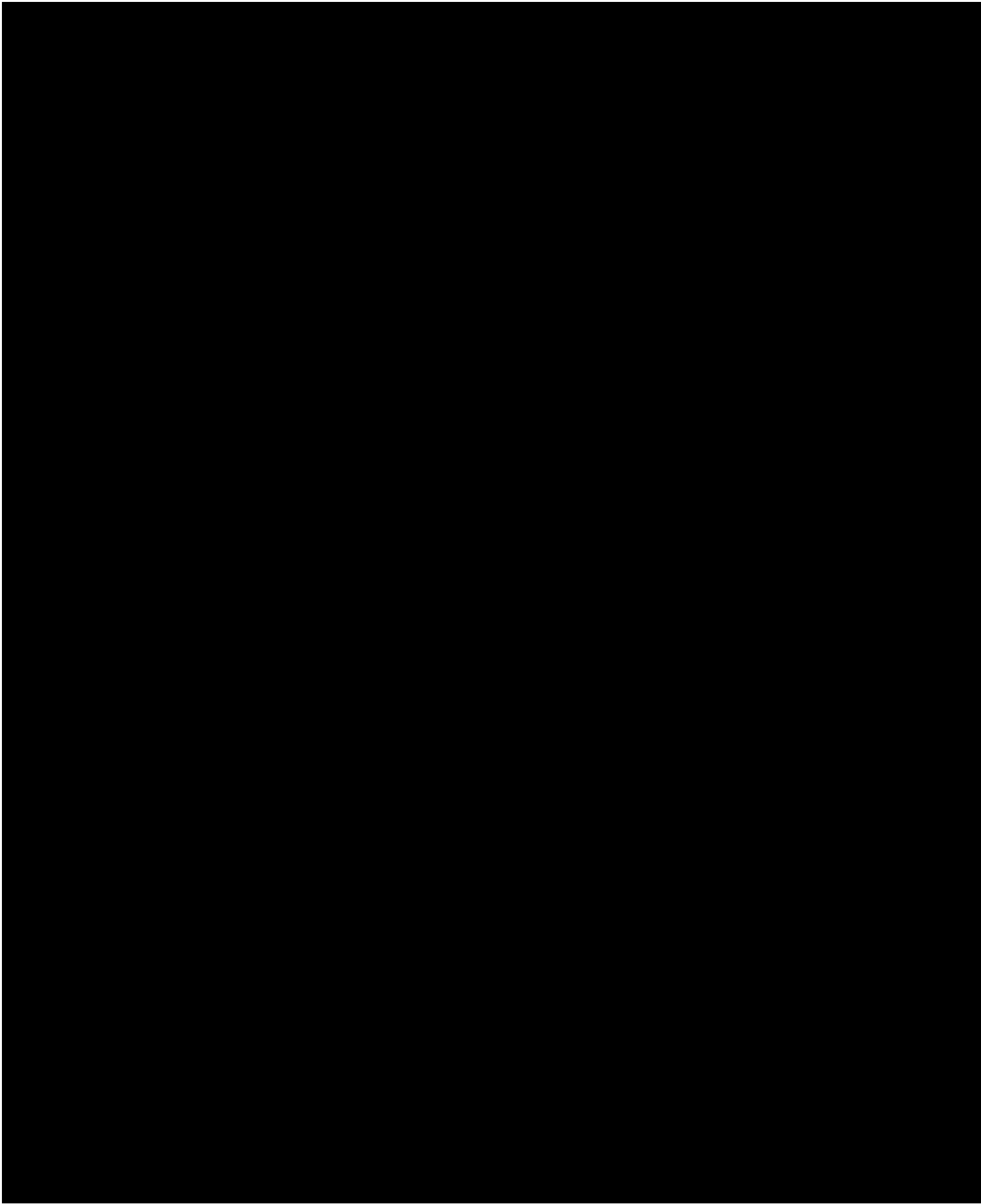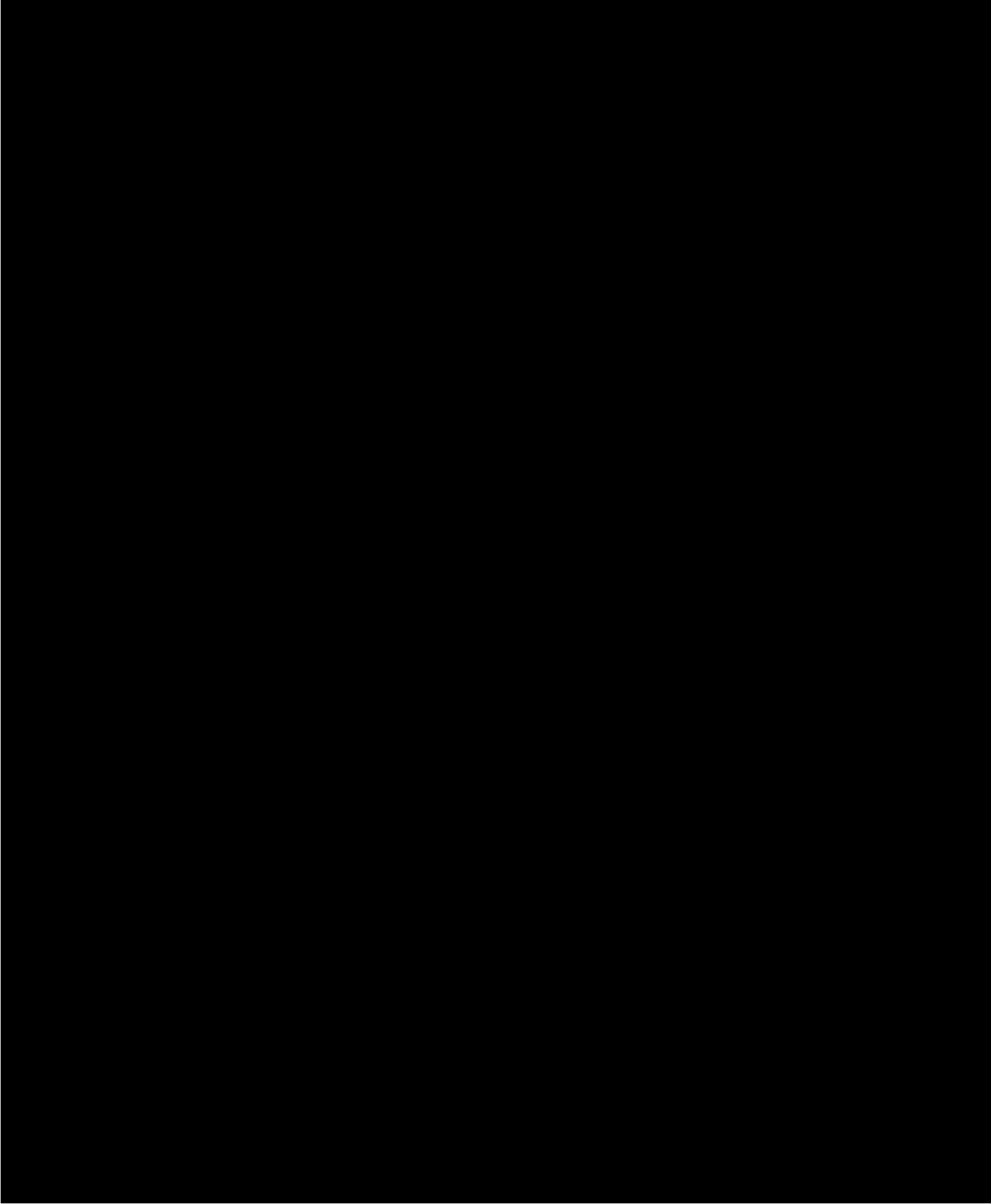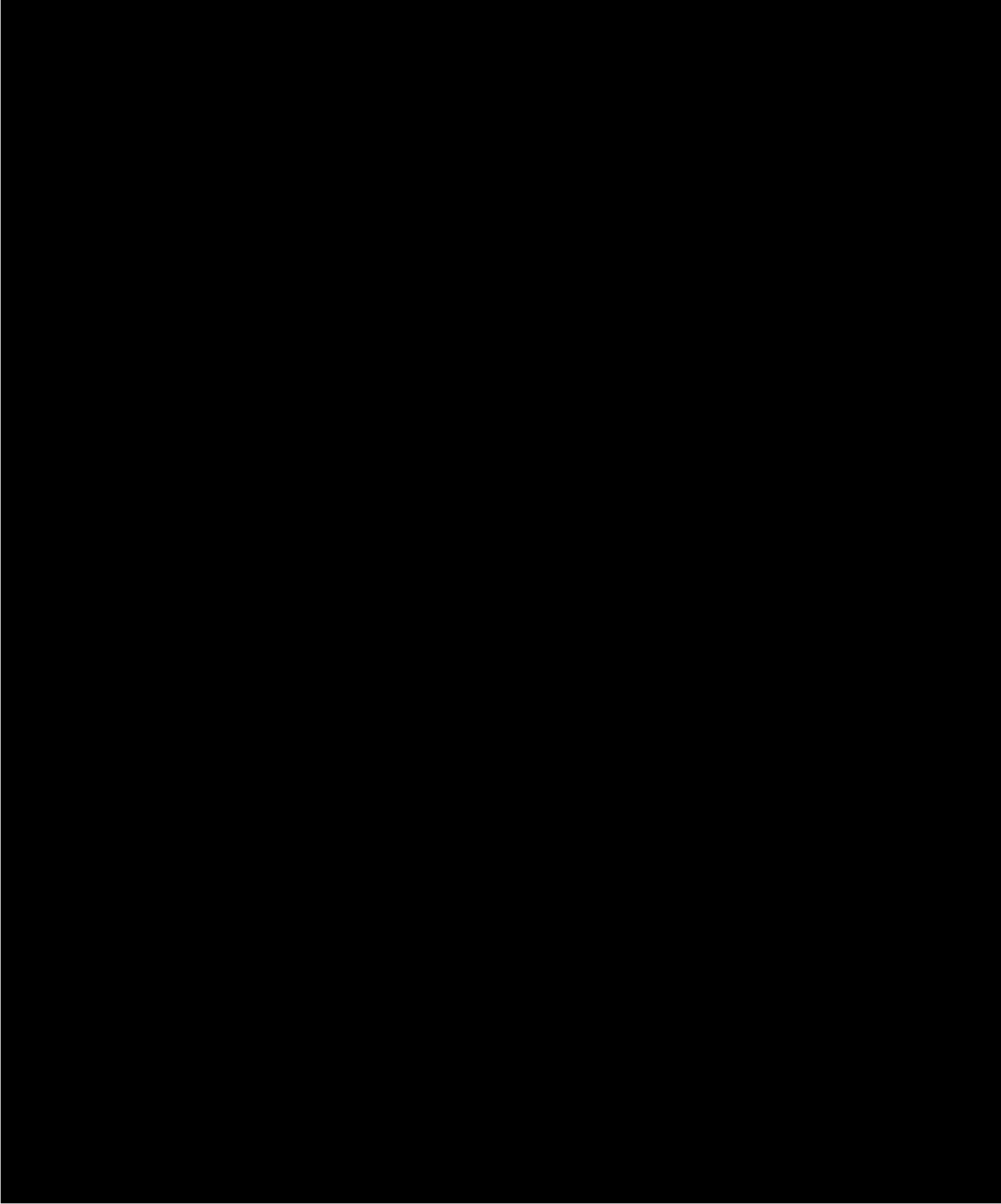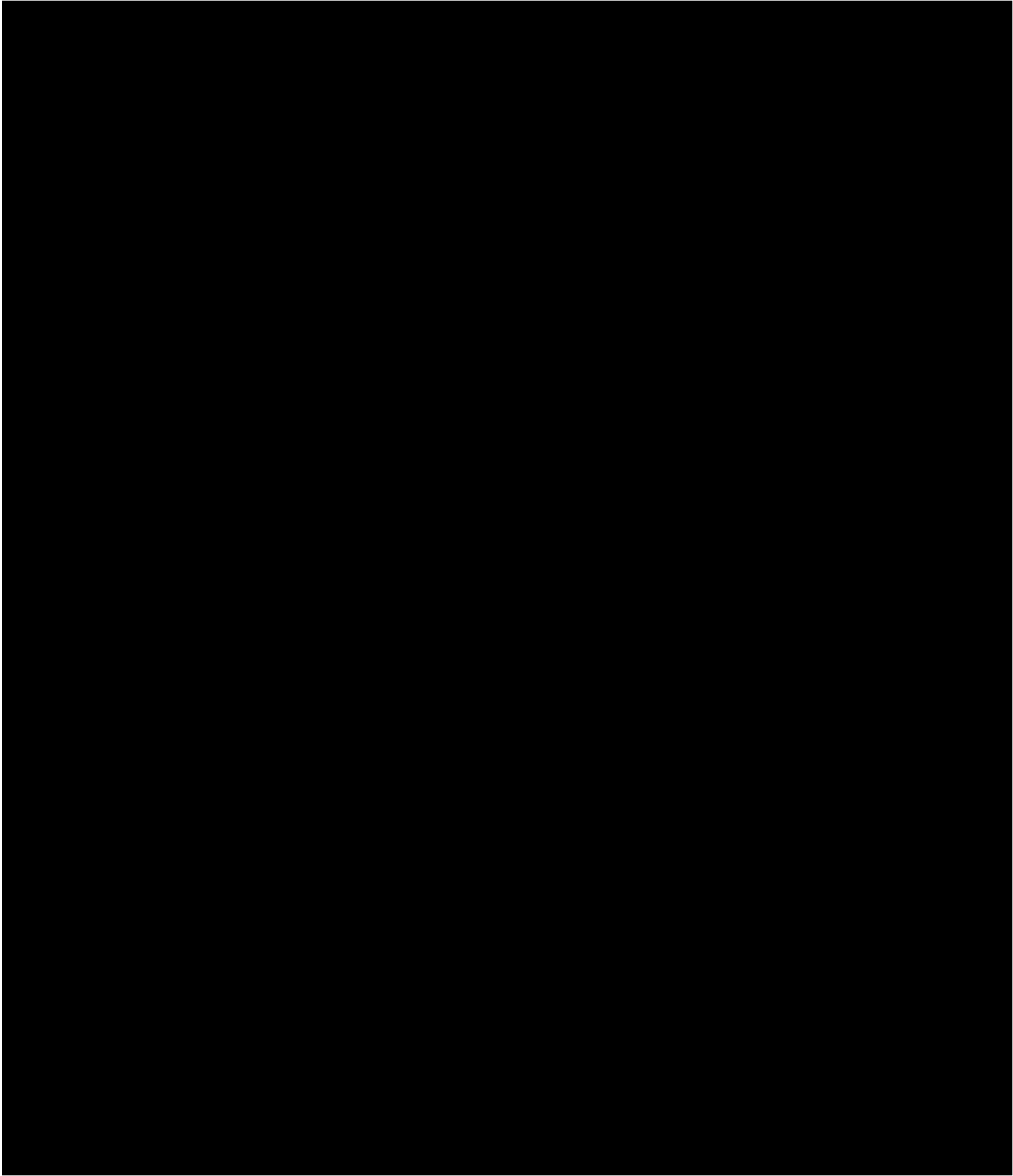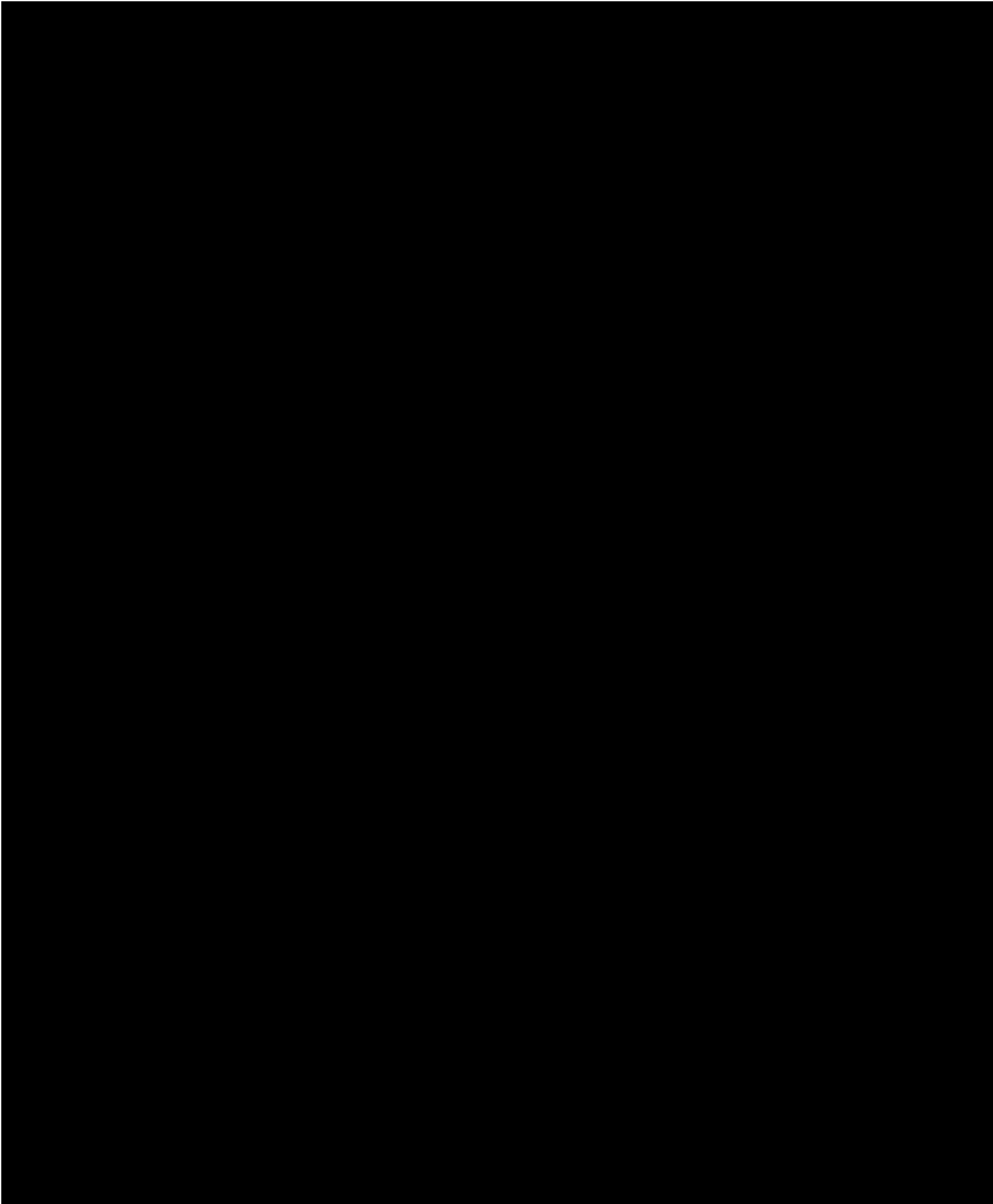
APPENDIX 1

Training Plan-Template

Arkansas Department of Human Services

July 2022

PALCO

Training Plan Overview

Purpose of the Training Plan

The training plan sets the standard for how and when training on the project/program takes place. Based upon understood stakeholder needs, the training plan identifies training objectives for the project/program, strategy for training and schedule for training initiatives. An effective training plan introduces consistency to training and assists in ensuring stakeholders receive the training they need when they need it.

A training plan is a living document that is created while the project/program is in the planning phase. It will be monitored (along with stakeholder registrations and communication plan) and executed during project/program implementation.

Instructions

1. Review project information by reading documentation (stakeholder registration, scope of work and project management plan), and discuss with the sponsor, project owner, and stakeholders.
2. Create the training plan.
3. Review with applicable stakeholders, project team, sponsor, and project owner for accuracy and completeness.

Next Steps

Execute the training plan and modify as required until project/program is closed.

Revision History

Change Made By	Date Change Made	Details of Change	Change Reviewed/ Approved by	Date change reviewed/ approved

Program Terminology

The terminology and acronyms commonly used for this program/project are included here.

Case Manager Portal (CMP)
The Palco CMP system incorporates several distinct but integrated user interface platforms that provide the tools and resources necessary for the work being performed. Intake provides an interface for the completion of enrollment documents, while Connect provides a portal for the management of time entry and payments for Employers and Workers, and the Admin portal provides data management and information to professional users.

Employer
The employer is the individual responsible for managing the self-directed services that are authorized in the Cash Expenditure Plan, including hiring the worker and supervising their performance. Also referred to as the EOR or Representative.

Palco
Palco is the Vendor Fiscal/Employer Agent (VF/EA FMS) and is responsible for enrollment processing, paying workers, withholding and filing employer taxes, and providing other administrative functions.

VF/EA Financial Management Service (FMS)
The VF/EA FMS option is a self-directed service delivery model designed to give participants maximum control over the services they receive. The FMS (Palco) completes the administrative work associated with this service delivery model to ensure appropriate participant support.

Participant
The participant is the recipient of the support services.

Caregiver/ Worker
The caregiver is employed by the participant's employer to provide services, including daily living skills, behavioral training, and specialized care.

Employer of Record (EOR) / Designated Employer
Individual responsible for managing the member directed services authorized in the Individual Supports Plan, including hiring and supervising the caregiver. The member may act as their own employer or designate someone else to serve in this role.

Support Coordinator (SC)
SC are also called counselors and provides technical guidance and orientation on how to participate in the self-directed model; helps the participant establish a spending plan.

Department of Human Services (DHS)
DHS oversees a variety of services for the citizens of Arkansas, including regulating nursing homes and childcare facilities, operating human development centers for the state's mentally challenged residents, conducting adoption and foster home programs, and providing mental health services.

Division of Provider Services and Quality Assurance (DPSQA)
DPSQA improves the quality of life for Arkansans through provider engagement and oversight. It is responsible for the certification, licensing, and surveying of long-term care and Medicaid providers. DPSQA also conducts quality assurance activities to review outcomes and determine compliance and promote workforce development.

Training Plan

Palco will provide training and support to all key stakeholders as part of the Arkansas self-directed program newly executed contract for 1/1/2023.

Training Objectives

1. Ensure Palco staff are knowledgeable and prepared for the execution of the newly awarded contract by 01/01/2023.
2. Ensure self-directing Participants/Employers and their Workers are prepared for any changes and new information for the exestuation of the newly awarded contract 01/01/2023.
3. Prepare the Department of Human Services professional staff to utilize the Palco CMP system and any enhanced/newly added features in preparation for the execution of the newly awarded contract by 01/01/2023.

Scope of Training Plan

The scope of this training will follow three stages- planning, preparing, execution, and evaluation. .

- **Planning:** The refinement and development of this plan to outline and capture all objectives and the goals associated with each.
- **Preparing:** The development of training materials and resources that will be utilized to educate and training individuals.
- **Execution:** The delivery of training and materials to stakeholders.
- **Evaluation:** The reflection of review of training delivery to capture feedback and identify and remaining gaps or areas needing attention.

Audiences

Palco Staff
Any Palco team member working with the AR Department of Human Services program. Including but not limited to executive leadership, counselors, enrollment specialist, customer support, payroll, billing, and project management staff.

Self-directing Participant/Employers and Workers
Program service recipients and their supports who utilize the self-directed service model and the Palco tools.

Arkansas Department of Human Services Staff
Any DHS/DPSQA staff who will be utilizing the Palco tools and resources to the oversight and management of the service delivery model. This audience may extend to other professional users such as DHS Nurses, community liaison and other stakeholders who provide input and value into the execution of the service delivery.

Training Needs Assessment

Areas of Attention
Trainings will include enrollment documents and coverage of forms, online timesheet portal, EVV, setting up direct deposit accounts, provide background check support. The following areas of the Palco system and tools will be the focus of training. Each audience will receive a training tailored to their individual needs and daily functions.

- Palco Intake – Enrollment
- Palco CMP – Professional users' access and data storage management
- Palco Connect- Time entry and EVV integration

Training Methods

Overview
Palco values education and training in all aspects of our business both internally and externally as evidenced by our dedicated in-house training team of self-direction experts. Knowledgeable users of self-directed services are a key component to a successful program, and we know that when people are informed, they can be empowered.

Trained Palco staff are already operational and prepared to offer skills training in a variety of formats to benefit stakeholders. In addition, content is already drafted and ready for adoption and implementation immediately upon approval by DHS staff. We will complete a needs assessment with DHS to determine all the training requirements outlined in Section 2.5.7.D in the RFP and set a training schedule. Trainings will include enrollment documents and coverage of forms, online timesheet portal, EVV, setting up direct deposit accounts, provide background check support.

In-Person Learning
Palco's trained and already mobile regionally based staff placed strategically across the state of Arkansas are prepared to meet the one-to-one needs of Arkansas stakeholders by facilitating training in the homes of individuals. Speed, content, and delivery styles can be tailored to meet the needs of each learner and ensure maximum absorption of key concepts and information.

Group Training
At times, individuals may benefit from a group led training to promote collaborations and allow for meeting settings in the community. Palco will execute group training as applicable within the communities at locations such as the library, community centers, and senior resource locations.

Webinars
Palco utilized the GoTo Webinar training platform for the development and delivery of all webinar-based trainings. The platform provides Palco training department and staff with several features and benefits that enhance the training experience including customizable audience sizes, engaging polls and surveys, email integrations, reporting and analytics. Training registration can be tailored to specific topics and audiences. Additionally, the GoTo training suite includes access to a platform for the storage of video tutorials and a learning library. Live trainings can be recorded and stored for users to access later/time that is convenient to them.

Video Tutorials and Library
The Palco training library is comprised of a variety of topic focused information that can be accessed on demand 24/7. Some videos are short in nature covering a very specific topic such as reading a paystub while others may be longer to cover an more extensive process such as completing and submitting an entire enrollment packet.

Training Schedule

Training Schedule

Type of training	Source for material	Audience	Schedule	Training material
Train the trainer sessions	Palco	Palco Consoler Staff	July 2022-September 2022 (ongoing)	• Workshops • Presentations • Webinars • Video tutorials • Manuals • Reference guides • One-page "cheat" sheet • FAQs
Enrollment Training PAR/AR	Palco	Participant (PAR)/Employer (EOR)	October 2022-December 2022	• Presentations • Webinars • Video tutorials • Manuals • Reference guides • One-page "cheat" sheet • FAQs
Payment Training PAR/AR	Palco	Participant (PAR)/Employer (EOR)	October 2022-December 2022	• Presentations • Webinars • Video tutorials • Manuals • Reference guides • One-page "cheat" sheet • FAQs
EVV Training PAR/AR	Palco	Participant (PAR)/Employer (EOR)	October 2022-December 2022	• Presentations • Webinars • Video tutorials • Manuals • Reference guides • One-page "cheat" sheet • FAQs
Payment Training EE	Palco	Caregiver	October 2022-December 2022	• Presentations • Webinars • Video tutorials

				• Manuals • Reference guides • One-page "cheat" sheet • FAQs
EVV EE	Palco	Caregiver	October 2022-December 2022	• Presentations • Webinars • Video tutorials • Manuals • Reference guides • One-page "cheat" sheet • FAQs

Roles and Responsibilities

Role	Accountabilities	Skills/Considerations
Training Manager	• Develop the training plan • Responsible for managing and completing the training program, including the overseeing of instructional materials and training delivery	• Understanding of adult education best practices • Subject matter expert on all topics and key concepts being trained on • Understand the goals of the project • Understand the key deliverable and timelines for completion
Project Manager	• Assisting in developing the training plan	• Understand the goals of the project • Understand the key deliverable and timelines for completion
SC Department Management	• Responsible for managing and counselor staff in their outreach and training delivery	• Understand the key deliverable and timelines for completion as well as materials and concepts.
Counselors (Trainers)	• Responsible to disseminate instructional materials and training delivery	• Understand the key deliverable and timelines for completion as well as materials and concepts.

Training Evaluation

Evaluation Sample
The following provides insight into the training evaluation that will be delivered during the last phase of the training plan to gage understanding and determine any gaps or areas of attention that are still needing to be addressed. Evaluations can be delivered via the online webinar platform, survey monkey, or via a paper form.

Sample Questions

How would you rate the knowledge of the Palco Trainer you worked with?

5. Excellent   **4.** Above Average   **3.** Average   **2.** Poor   **1.** Very Poor

How would you rate the tools provided to you by your Palco Support Coordinator?

5. Excellent   **4.** Above Average   **3.** Average   **2.** Poor   **1.** Very Poor

How would you rate the trainer's preparedness for your employer training / certification visit?

5. Excellent   **4.** Above Average   **3.** Average   **2.** Poor   **1.** Very Poor

How would you rate the trainer's ability to explain complex topics and answer your questions?

5. Excellent   **4.** Above Average   **3.** Average   **2.** Poor   **1.** Very Poor

Are there any outstanding questions or topics you would like more training on?

Other Comments:

APPENDIX 4

APPENDIX 5

APPENDIX 7

E

APPENDIX 8

SELF-DIRECTION
Fruad, Waste & Abuse

PALCO

OVERVIEW

Fraud, abuse and waste in Medicaid cost states billions of dollars every year, diverting funds that could otherwise be used for legitimate health care services. Not only do fraudulent and abusive practices increase the cost of Medicaid without adding value – they increase risk and potential harm to patients who are exposed. It is everyone's responsibility to protect against and report all suspected instances of fraud waste and abuse.

For more information: https://www.ncsl.org/research/health/medicaid-fraud-and-abuse.aspx

FRAUD

Medicaid fraud occurs when you provide false or untruthful information to claim medical reimbursements, such as false timesheets. Some examples of fraudulent timesheets include requesting payment for time not worked, forging another's signature to the timesheet, or coercing another into giving them part of the payment from Palco even though that person did not work the hours.

Arkansas law (Ark. Code Ann. §20-77-2505), the federal False Claims Act, and the Social Security Act Anti-Kickback Provision (42 U.S.C. 132Oa-7b(b)) all have separate reporting requirements when you suspect fraud, waste, and abuse of public funds. Each of these laws impose penalties for committing the act and for failing to report the act, even if you did not commit it. Penalties range from $10,000 per incident to 5 years in prison, or both. In addition, the following you can be disqualified from receiving Medicaid benefits.

WASTE

Waste refers to over-utilization of services, or practices that result in unnecessary costs. Waste also refers to useless consumption or expenditure without adequate return. For example: Providing services that are not medically necessary.

Like fraud, instances of waste should be reported and will not be tolerated.

ABUSE

Sometimes a worker, family member, or friend may step over the line and become disrespectful or even abusive to you. If you feel uncomfortable around a worker, family member, or friend because of disrespectful treatment, or if you observe someone taking advantage of you or mistreating you, let someone know about the situation immediately.

In Arkansas, abusing a dependent adult, an elderly person, or a child is a crime punishable by law. Criminal abuse of individuals includes physical or sexual abuse, financial abuse, neglect, and psychological abuse or intimidation. If you are being subjected to any form of abuse, report the situation immediately:

- Adult Protective Services at 1-800-482-8049
- Child Abuse Hotline at 1-800-484-5964
- Emergency Responders at 911
- Palco at 877-753-0999 or 501-604-9936