

# THE BEAST THEY CALL SELF-DIRECTION:

FINDING COMPLIANCE SUCCESS WITH  
SELF- DIRECTED SERVICES

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COMPLIANCE & QUALITY CONNECTIONS CONFERENCE 4.29.25



ADVOCACY  
AND RESOURCE  
CENTER

*A chapter of*  **The Arc**  
New York

# DISCLOSURE:

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Please note that this presentation is our experiences with Self-Direction and our “story”.

This presentation should not be viewed as legal or regulatory advice on the part of the presenters or our agency.

# THE BEAST ITSELF:

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- Expanded geographic area
- Families
  - Lack of or inability to understand the OPWDD system
- Self-Directed Staff
  - Employed by family but employee of record for agency
  - Understanding or adhering to responsibilities
  - Lack of on site supervisory oversight
- External Providers
  - Responsible for documents FI needs to be successful
  - Understanding or adhering to responsibilities

# THE BEAST ITSELF:

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- Complexity of billing and auditing
  - Traditional billing versus Pass-through
  - Multiple services to audit annually
    - Frequent regulatory changes

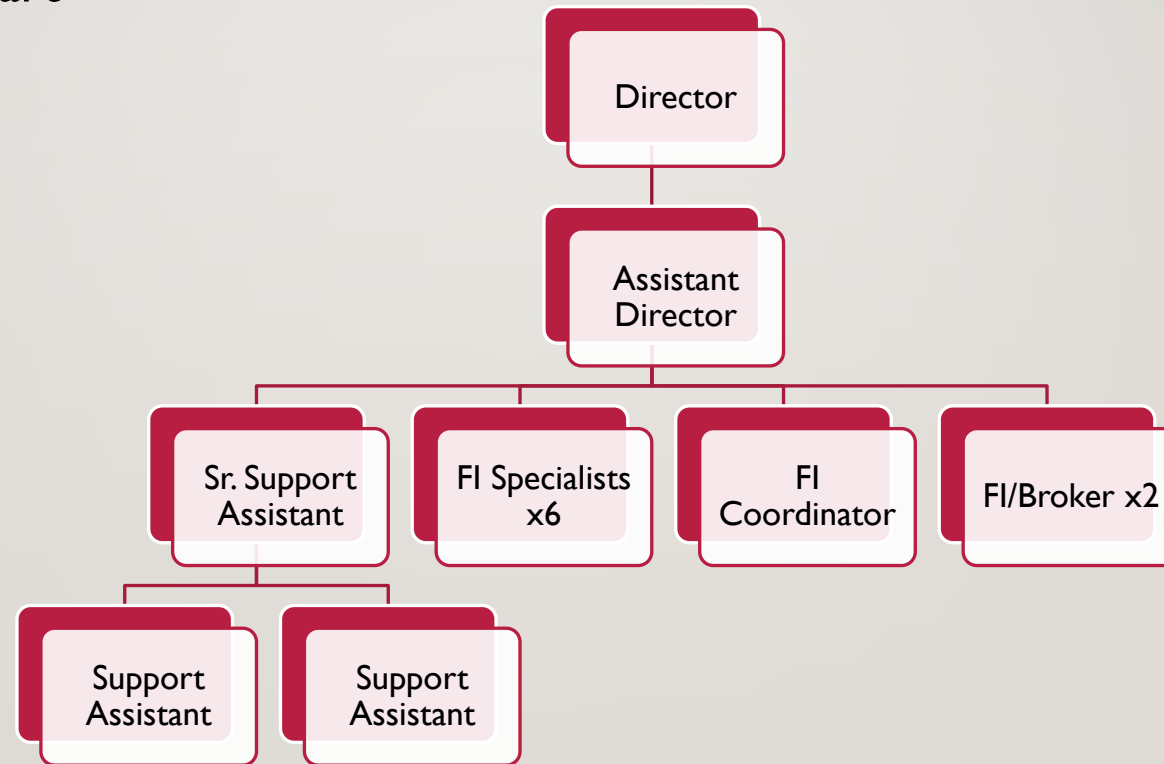
# MANAGING THE BEAST:

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- Why do agencies supply Self-Directed Services
  - Our Mission Statement
    - “Supporting people to live their lives to the fullest”
    - The Successes
  - Part of OPWDD’s strategy for more person-centered services
  - Diversification of Revenue Sources

# MANAGING THE BEAST:

- Organizational Chart



# MANAGING THE BEAST:

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- Staff and their roles
  - Director
    - The Director of Fiscal Intermediary Services provides strategic leadership and has final programmatic authority over all fiscal intermediary operations including staff training, broker functions program implementation and person centered planning ensuring regulatory alignment, operational excellence and meaningful individualized outcomes for those served.
  - Assistant Director
    - The Assistant Director provides comprehensive oversight and leadership of Fiscal Intermediary Services, broker functions, compliance, staff training and program implementation, ensuring all operations align with regulator standards while promoting person-centered practices that support individualized goals and meaningful outcomes.
  - Fiscal Intermediary Coordinator
    - The Fiscal Intermediary Coordinator plays a key role in ensuring regulatory compliance by training new and existing staff on policy changes, software updates while also developing clear, effective training materials to support ongoing operational excellence.

# MANAGING THE BEAST:

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- Staff and their roles (continued)
  - Fiscal Intermediary Specialist
    - The Fiscal Intermediary manages caseloads while ensuring compliance with state and Medicaid regulations, providing oversight and offering ongoing support to ensure effective program implementation and service delivery.
  - Agency Brokers
    - The Broker develops individualized Staff Action Plans and budgets, while actively connecting individuals to community supports and meaningful experiences that align with their goals interests in coordination with the FI Specialist, Care Manager and Individual served.
  - Support Assistants
    - The Support Assistant provides essential support across daily operations, including Self-Directed Staff coordination, administrative tasks and general team supports to ensure seamless workflow and efficiency.

# MANAGING THE BEAST:

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- Internal Controls
  - Maintaining a “strong” team
  - Systems
  - Best Practices
  - Safeguards
  - Keeping up on regulatory changes

# MANAGING THE BEAST:

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- Investigations
  - How we become aware of a concern
  - Conducting the investigation
  - Determining outcome
  - Follow up and recommendations

# MANAGING THE BEAST:

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- Investigative Case Examples
  - Missing service in Life Plan
  - No published rates for IDGS approved community classes
- Theft
  - Waiver
  - Non-Waiver

# WHEN THE BEAST REQUIRES EXTERNAL AGENCIES INVOLVEMENT:

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- Involving an external agency due to Medicaid Fraud
  - Office of the Medicaid Inspector General (OMIG)
    - Self-Disclosure
      - Full or Abbreviated
  - Attorney General
    - Medicaid Fraud Control Unit (MFCU)
  - Law Enforcement
    - Filing Criminal Charges

# PRESENTERS

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# QUESTIONS & COMMENTS

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Thank you for having us!

