State of Nevada

The State of Nevada Purchasing Division, on Behalf of the State of Nevada Aging and Disability Services Division

Request for Proposal: 3459

Proposal to Provide Self-Directed Financial Management Services

September 5th, 2017 1:00PM

Rhonda Miller, Purchasing Officer II
State of Nevada, Purchasing Division
515 E. Musser Street, Suite 300
Carson City, NV 89701

Part I – Technical Proposal

Part IA – Technical Proposal	
RFP Title:	Self-Directed Financial Management Services
RFP:	3459
Vendor Name:	GT Independence
Address:	215 Broadus St, Sturgis, MI 49091
Opening Date:	8/10/17
Opening Time:	2:00 PM

Section I – Title Page		**2**
Section II – Table of Contents		**3**
Section III – Vendor Information Sheet		**4**
Section IV – State Documents		**6**
Section V – Scope of Work		**26**
2.2	**RESPONSIBILITIES**	**30**
2.3	**MANAGEMENT OF ADSD INDIVIDUAL BUDGET FUNDS**	**34**
2.4	**PAYROLL PROCESS**	**37**
2.5	**END OF YEAR FEDERAL TAX PROCESS.**	**43**
2.6	**REPORTS**	**44**
2.7	**INFORMATION TECHNOLOGY**	**48**
2.8	**CUSTOMER SERVICE SYSTEM**	**49**
2.9	**ADDITIONAL RESPONSIBILITIES**	**53**
2.10	**AUDIT REQUIREMENTS**	**54**
2.11	**RECORDS**	**54**
2.12	**VETERAN DIRECTED HOME & COMMUNITY BASED SERVICES**	**55**
2.13	**END OF CONTRACT DELIVERABLES**	**56**
Section VI– Company Background and References		**61**
Section VII – Attachment F – Proposed Staff Resume		**70**
Section VIII – Other Informational Material		**78**

Section III – Vendor Information Sheet

VENDOR INFORMATION SHEET FOR RFP 3459

Vendor Shall:

A) Provide all requested information in the space provided next to each numbered question. The information provided in Sections V1 through V6 shall be used for development of the contract;

B) Type or print responses; and

C) Include this Vendor Information Sheet in Section III of the Technical Proposal.

V1	Company Name	GT Independence

V2	Street Address	215 Broadus St.

V3	City, State, ZIP	Sturgis, MI 49091

V4	Telephone Number		
	Area Code: 269	Number: 651-4500	Extension:

V5	Facsimile Number		
	Area Code: 269	Number: 651-4501	Extension:

V6	Toll Free Number		
	Area Code: 877	Number: 659-4500	Extension:

V7	***Contact Person for Questions / Contract Negotiations, including address if different than above***
	Name: Adam Kujacznski
	Title: Director of Marketing
	Address:215 Broadus St. Sturgis, MI 49091
	Email Address: akujacznski@gtindependence.com

V8	Telephone Number for Contact Person		
	Area Code: 269	Number: 221-6272	Extension:

V9	Facsimile Number for Contact Person		
	Area Code: 269	Number: 651-4501	Extension:

V10	***Name of Individual Authorized to Bind the Organization***	
	Name: John Carmichael	Title: CEO

V11	Signature ***(Individual shall be legally authorized to bind the vendor per NRS 333.337)***	
	Signature: John K. Carmichael	Date: 9/6/2017

05

Section IV – State Documents

The State documents section shall include the following:

A. The signature page from all amendments signed by an individual authorized to bind the organization.
B. Attachment A – Confidentiality and Certification of Indemnification signed by an individual authorized to bind the organization.
C. Attachment B – Vendor Certifications signed by an individual authorized to bind the organization.
D. Attachment H – Certification Regarding Lobbying signed by an individual authorized to bind the organization.
E. Copies of any vendor licensing agreements and/or hardware and software maintenance agreements.
F. Copies of applicable certifications and/or licenses/information

ATTACHMENT A – CONFIDENTIALITY AND CERTIFICATION OF INDEMNIFICATION

Submitted proposals, which are marked "confidential" in their entirety, or those in which a significant portion of the submitted proposal is marked "confidential" **shall not** be accepted by the State of Nevada. Pursuant to NRS 333.333, only specific parts of the proposal may be labeled a "trade secret" as defined in NRS 600A.030(5). All proposals are confidential until the contract is awarded; at which time, both successful and unsuccessful vendors' technical and cost proposals become public information.

In accordance with the submittal instructions of this RFP, vendors are requested to submit confidential information in separate files marked "**Part IB Confidential Technical**" and "**Part III Confidential Financial**".

The State shall not be responsible for any information contained within the proposal. If vendors do not comply with the labeling and packing requirements, proposals shall be released as submitted. In the event a governing board acts as the final authority, there may be public discussion regarding the submitted proposals that shall be in an open meeting format, the proposals shall remain confidential.

By signing below, I understand it is my responsibility as the vendor to act in protection of the labeled information and agree to defend and indemnify the State of Nevada for honoring such designation. I duly realize failure to so act shall constitute a complete waiver and all submitted information shall become public information; additionally, failure to label any information that is released by the State shall constitute a complete waiver of any and all claims for damages caused by the release of the information.

This proposal contains Confidential Information, Trade Secrets and/or Proprietary information.

Please initial the appropriate response in the boxes below and provide the justification for confidential status.

Part IB – Confidential Technical Information			
YES		NO	X
Justification for Confidential Status			

Part III – Confidential Financial Information			
YES	X	NO	
Justification for Confidential Status			
This section contains audited financial information that is confidential in nature.			

Company Name

Signature

John Carmichael

Print Name

9/6/17

Date

This document shall be submitted in Section IV of vendor's technical proposal

ATTACHMENT B – VENDOR CERTIFICATIONS

Vendor agrees and shall comply with the following:

(1) Any and all prices that may be charged under the terms of the contract do not and shall not violate any existing federal, State or municipal laws or regulations concerning discrimination and/or price fixing. The vendor agrees to indemnify, exonerate and hold the State harmless from liability for any such violation now and throughout the term of the contract.

(2) All proposed capabilities can be demonstrated by the vendor.

(3) The price(s) and amount of this proposal have been arrived at independently and without consultation, communication, agreement or disclosure with or to any other contractor, vendor or potential vendor.

(4) All proposal terms, including prices, shall remain in effect for a minimum of 180 days after the proposal due date. In the case of the awarded vendor, all proposal terms, including prices, shall remain in effect throughout the contract negotiation process.

(5) No attempt has been made at any time to induce any firm or person to refrain from proposing or to submit a proposal higher than this proposal, or to submit any intentionally high or noncompetitive proposal. All proposals shall be made in good faith and without collusion.

(6) All conditions and provisions of this RFP are deemed to be accepted by the vendor and incorporated by reference in the proposal, except such conditions and provisions that the vendor expressly excludes in the proposal. Any exclusion shall be in writing and included in the proposal at the time of submission.

(7) Each vendor shall disclose any existing or potential conflict of interest relative to the performance of the contractual services resulting from this RFP. Any such relationship that might be perceived or represented as a conflict shall be disclosed. By submitting a proposal in response to this RFP, vendors affirm that they have not given, nor intend to give at any time hereafter, any economic opportunity, future employment, gift, loan, gratuity, special discount, trip, favor, or service to a public servant or any employee or representative of same, in connection with this procurement. Any attempt to intentionally or unintentionally conceal or obfuscate a conflict of interest shall automatically result in the disqualification of a vendor's proposal. An award shall not be made where a conflict of interest exists. The State shall determine whether a conflict of interest exists and whether it may reflect negatively on the State's selection of a vendor. The State reserves the right to disqualify any vendor on the grounds of actual or apparent conflict of interest.

(8) All employees assigned to the project are authorized to work in this country.

(9) The company has a written equal opportunity policy that does not discriminate in employment practices with regard to race, color, national origin, physical condition, creed, religion, age, sex, marital status, sexual orientation, developmental disability or handicap.

(10) The company has a written policy regarding compliance for maintaining a drug-free workplace.

(11) Vendor understands and acknowledges that the representations within their proposal are material and important, and shall be relied on by the State in evaluation of the proposal. Any vendor misrepresentations shall be treated as fraudulent concealment from the State of the true facts relating to the proposal.

(12) Vendor shall certify that any and all subcontractors comply with Sections 7, 8, 9, and 10, above.

(13) The proposal shall be signed by the individual(s) legally authorized to bind the vendor per NRS 333.337.

Guardiantrac, LLC d/b/a GT Independence
Vendor Company Name

John H. Carmichael
Vendor Signature

John Carmichael
Print Name

9/6/17
Date

This document shall be submitted in Section IV of vendor's technical proposal

ATTACHMENT H – CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or shall be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federally appropriated funds have been paid or shall be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all sub awards at all tiers (including subcontracts, sub grants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

By: _____ 9/6/17

Signature of Official Authorized to Sign Application — Date

For: Guardiantrac, LLC d/b/a GT Independence

Vendor Name

_____

Project Title

This document shall be submitted in Section IV of vendor's technical proposal

State of Nevada
Department Administration
Purchasing Division
515 E. Musser Street, Suite 300
Carson City, NV 89701

Brian Sandoval
Governor

Jeffrey Haag
Administrator

SUBJECT:	Amendment 1 to Request for Proposal 3459
RFP TITLE:	Self-Directed Financial Management Services
DATE OF AMENDMENT:	August 3, 2017
DATE OF RFP RELEASE:	July 10, 2017
OPENING DATE:	August 10, 2017
OPENING TIME:	2:00 PM
CONTACT:	Ronda Miller, Procurement Staff Member

The following shall be a part of RFP ***3459.*** If a vendor has already returned a proposal and any of the information provided below changes that proposal, please submit the changes along with this amendment. You need not re-submit an entire proposal prior to the opening date and time.

RFP TIMELINE CHANGES:

OLD TIMELINE:

Task	Date/Time
Deadline for submitting questions	7/18/17 @ 12:00 PM
Answers posted to website	On or about 7/24/17
Deadline for submittal of Reference Questionnaires	No later than 4:30 PM on 8/9/17
Deadline for submission and opening of proposals	No later than 2:00 PM on 8/10/17
Evaluation period (approximate time frame)	8/11 ~ 8/23
Selection of vendor	On or about 8/23/17
Anticipated BOE approval	10/10/17
Contract start date (contingent upon BOE approval)	4/1/18

NEW TIMELINE:

Task	Date/Time
Deadline for submitting questions	7/18/17 @ 12:00 PM
Answers posted to website	On or about 8/11/17
Deadline for submittal of Reference Questionnaires	No later than 4:30 PM on 9/6/17
Deadline for submission and opening of proposals	No later than 2:00 PM on **9/7/17**
Evaluation period (approximate time frame)	9/8 ~ 9/19
Selection of vendor	On or about 9/19/17
Anticipated BOE approval	12/12/17
Contract start date (contingent upon BOE approval)	4/1/18

ALL ELSE REMAINS THE SAME FOR RFP 3459.

Vendor must sign and return this amendment with proposal submitted.

Vendor Name: _____

Authorized Signature: _____

Title: _____ Date: _____

This document must be submitted in the "State Documents" section of vendors' technical proposal.

State of Nevada
Department Administration
Purchasing Division
515 E. Musser Street, Suite 300
Carson City, NV 89701

Brian Sandoval
Governor

Jeffrey Haag
Administrator

SUBJECT:	Amendment 2 to Request for Proposal 3459
RFP TITLE:	Self-Directed Financial Management Services
DATE OF AMENDMENT:	August 10, 2017
DATE OF RFP RELEASE:	July 10, 2017
OPENING DATE:	September 9, 2017
OPENING TIME:	2:00 PM
CONTACT:	Ronda Miller, Procurement Staff Member

The following shall be a part of RFP ***3459.*** If a vendor has already returned a proposal and any of the information provided below changes that proposal, please submit the changes along with this amendment. You need not re-submit an entire proposal prior to the opening date and time.

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1. Section 1. How many current participants are served in the State-Funded Self-Directed Program and the VD-HCBS Program?

   The VD-HCBS Program currently has 1 participant enrolled, expansion of up to 30 participants is expected within the next year.

   DRC had 188 as of 06/30/17.
   RRC has 21.

2. Section 2.3 - What is the average size of the participant's annual budget for both the State-Funded Self-Directed Program and the VD-HCBS Program?

   The average annual budget for VD-HCBS is projected at $37,260 ($3,105 per month).

3. Section 2.3 - On average, how much of a participant's annual budget is for payroll and how much is for non-labor related payments?

   This information is unavailable at this time.

4. Section 2.3.4 - What is the current non-labor related payment schedule?

   There is no current schedule.

5. Section 2.3.4 - What is the current non-labor cost outlay?

The budgets can be used for labor and non-labor items, and the outlay varies each month depending on participant choice.

6. Section 2.3.4 - Do all participants have non-labor related payments in their budgets or do some only utilize their budget for payroll?

   It is a mixture of both.

7. Section 2.3.4 - If not all participants have non-labor related payments, approximately how many do?

   They can all have non-labor related payments.

8. Section 2.4 - What is the cost of the Criminal History Background Checks? Who pays for that expense?

   The current expense for a criminal history background check is $26.00 per employee. It comes out of the participant's monthly budget as a one-time expense.

9. Section 2.4 - How is worker's compensation currently procured for participant employers?

   The contracted FMS entity procures worker's compensation for participant employers if they choose to purchase it. It is purchased through their monthly budget.

10. Section 2.4 - Is there a cost for license and vehicle safety checks? If so, who pays for that expense?

    Though not required, it could be paid for out of the participant's monthly budget, if they choose to purchase it.

11. Section 2.4 What is the current payroll schedule?

    Payroll is bi-monthly.

12. Section 2.4 What is the current total cost outlay for payroll and payroll taxes?

    This information is unavailable at this time.

13. Section 2.7.1 What is the format for the transfer of information between ADSD and the FMS?

    Information is transferred via fax and/or email.

14. Section 2.12.1 - In what timeframe does the readiness review need to be conducted?

    The Readiness Review process will begin upon selection of vendor. It takes approximately 4 months to complete.

15. Section 3.1.4 - Does a proposer need to obtain a business license prior to submitting a proposal?

    No, only if chosen and before starting services.

16. Section 4. - What is the current fee charged for FMS services?

The current fee is $42 per month per participant.

17. Section 4. - Is the fee paid administratively or does it come out of the participant's budget?

It is paid administratively.

18. Section 5.2.2 - Can billing be done electronically via EDI billing files?

No.

19. Section 5.2.2 - If billings can be done electronically, how long does it take for reimbursement?

Not applicable.

20. Attachment G. Would ADSD consider one fee for the State-Funded Self-Directed Program and a different fee for the VD-HCBS Program?

No, the fee should be the same for each program.

21. How many participants are currently enrolled in the State-funded Self-Directed Program and the VD-HCBS Program?

The VD-HCBS Program currently has 1 participant enrolled, expansion of up to 30 participants is expected within the next year.

The State-funded Self-Directed program currently has 216 participants.

22. On average how many new enrollments does each program generate monthly?

The VD-HCBS Program is too new to estimate this.

The State-funded Self-Directed program expects to add about 5 additional enrollments per month.

23. What is the current per member per month rate for FMS service?

The current fee is $42 per month per participant.

24. Who is the incumbent vendor(s)?

The incumbent vendor is Palco.

25. What is the current satisfaction rate of participants and employees in the program?

This information is unavailable for RRC and SRC and VD-HCBS. For DRC it is "Fair".

26. Question 6: Section 2.2.4 – Will the State allow the agent to perform in-person enrollment meetings to distribute and collect enrollment documents?

Yes, the agent can perform in-person enrollments if feasible.

27. Section 2.4 - Are all Employers required to have workers' compensation insurance or only when required by law?

    Worker's compensation insurance is only necessary when required by law, however participants can choose to purchase it even if it is not required by law.

28. Section 2.4 – Are Background Checks and Workers' Compensation cost paid for out of the Participant's budget or billed separately to the State?

    Both are paid out of the participants budget.

29. Section 2.4 – Does the state have parameters for approving license and vehicle safety checks?

    No.

30. Section 2.7.1 – What format does ADSD currently use for transfer of information?

    Secure email and Telephone.

31. Section 2.8.14 – is training required to take place in a face-to-face setting?

    No.

32. Number of Participants. Can the State provide/clarify the following information:
    a. Number of Participants currently being served on each of the Self-directed programs?

       The VD-HCBS Program currently has 1 participant enrolled, expansion of up to 30 participants is expected within the next year. Refer to question 21 of this amendment.

    b. The distribution of Participants across the State by service region?

       The VD-HCBS (veterans) Program:
       Rural: 1

       The following participants are related to the State Funded, Self-Directed Program (Developmental Services):
       Las Vegas: 188
       Reno/Sparks: 37
       Rural: 21

    c. An estimate on the growth rate and number of new referrals for each program?

       The VD-HCBS program is expecting to expand to up to 30 participants within the next year. Refer to question 22 of this amendment.

33. Current Vendor. Are the Children Self-direction program and the VD-HCBS program currently being served by the same vendor under the same contract?

Yes, both programs are served by the same vendor under the same contract.

34. VD-HCBS Program. Does the VD-HCBS program run at the State level, or are there individual AAA/ADRCs administering the program? If the latter, do the programs operate under identical requirements for services and billing processes? To what entity does the FMS vendor submit billing claims for the VD-HCBS program (state/local entity)? Does the VD-HCBS program use the UB-04 form for billing?

    The VD-HCBS program is run at the state level in partnership with local ADRCs. The vendor submits billing claims to the state entity. UB-04 forms are used by the state entity for billing.

35. Overtime and Travel Time. Does the state have specific requirements regarding overtime and travel time for each of the programs? If so, please clarify.

    Overtime is only allowed as part of the participants budget. It is the responsibility of the participant to manage their monthly budget to ensure hours are worked according to the approved spending plan.

36. Transition. Can the State provide/clarify the following information:
    a. Number of Workers per program?

       State-funded = approximately 200 active workers; Veterans'-Directed HCBS = 2.

    b. Will the Participant and Worker information be provided from the current vendor, the State, or another entity?

       Current Vendor.

    c. Will there be a quality review of the information to be provided to the new Contractor? If so, will the State be involved?

       The Contractor will participate in any review.

    d. Will the Worker Transfer Information identify the Participants they serve as well as which programs/waivers?

       Yes.

    e. Will existing expenditure totals for the current budget be available during the transfer?

       Yes.

    f. Will vendor information be provided during transfer, if goods and services are allowed under the program requirements?

       Yes.

    g. Will Case Manager Information and caseload data be available as transfer data?

Yes.

h. What role, if any, will Case Managers play in the transfer process?

Collecting time cards, reviewing amounts, approving payments, assisting with the application process.

37. Payroll Process, 2.4, Page, 8:

a. "Prior to employment, FMS as applicable and required, will assist individuals or families with securing Criminal History Background Checks (CHBC)..." Can the state clarify what background checks are required and who pays for them?

Background checks are paid from the participant's budget as a one-time purchase.

b. What percentage of Workers have Direct Deposit versus paper checks?

100% are direct deposit.

c. Are Direct Deposit pay stubs required to be mailed or will online access suffice?

Online access would suffice.

d. Who pays for Workers' Compensation?

Workers' Compensation is paid from the participant's budget.

38. Worker Registry, 2.8.12, Page, 13: Does the State have specific Worker Registry requirements or capabilities the Vendor must meet? If so, can you provide additional information?

Developmental Services does not have specific worker registry requirements.

VD-HCBS does not have specific worker registry requirements.

39. Electronic Visit Verification. Does the State have a plan for EVV implementation before the Cures Act begins in 2019?

This program is paid using 100% General Funds.

40. Good and Services. What is the average number of goods and services payments per month?

Two per participant.

41. Management of ADSD Individual Budget Funds, 2.3.5, Page, 8: FMS assumes all liability for overpayments unless a prior authorization is obtained. Can the FMS provider bill the individual/employer directly for repayment of that overpayment if prior authorization was denied?

Yes.

What is the dollar amount of the average Participant budget?

$450

42. Billing, 5.2.3 Can the State provide/clarify the following information:

    a. "The State presently has a Procurement Card Program that participating State agencies may use to pay for some of their purchases. The Program is issued through a major financial institution and is treated like any other major credit card. Using agencies may desire to use the card as a method of payment. No additional charges or fees shall be imposed for using the card. Please indicate in your proposal response if you will accept [...]" Can the state complete the text for the missing portion of this statement?

    Not applicable to this RFP.

    b. Does the State have electronic/EDI capability for billing submittal?

    Not at this time.

43. RFP Sections 2.4.12 & 2.4.13 These tax regulations were revised five years ago to allow filing utilizing an aggregate FEIN. RFP Section 2.4.14 Advanced EIC is no longer allowed.

Question is unclear.

44. Section 1. What is the estimated number of clients served on this program?

The VD-HCBS Program currently has 1 participant enrolled, expansion of up to 30 participants is expected within the next year.

45. Section 1. What is the anticipated growth rate of the State-Funded Self-Directed Program and the Veteran Directed Home and Community Based Services Program?

The VD-HCBS program is expecting to expand to up to 30 participants within the next year.

46. Section 1. What is the current FMS provider's fee schedule or service rate?

The current fee is $42 per month per participant.

47. Section 1.1.2.1. What are the qualifications and what does verifying entail?

Section 1.1.2.1 is part of the "Goals and Objectives" section of this RFP. As such, the proposing vendor responses to this RFP will be used to verify and determine which vendor(s) meet the qualifications.

48. Section 2.2.4. Are in-person enrollments required?

No.

49. Section 2.4. Is the vendor required to monitor expiration of licenses and vehicle safety checks?

No.

50. Section 2.4. What qualifies as an acceptable vehicle safety check?

Not applicable.

51. Section 2.4. Are the background checks paid for out of the participant's budgets?

Yes, background checks are paid as a one-time purchase from the participant's budget.

52. Section 5.2.3. What charges or purchases is the Procurement Card used for?

Not applicable to this RFP.

53. Section 8.4.2.2. What are the required elements in the cost proposal?

Refer to Attachment G within RFP 3459.

54. Section 9.1. What formula will be used to determine the 'lowest cost submitted by a vendor' when there are five different pricing options?

Lowest Total Cost per year and/or per contract period.

55. Attachment G. How does the outline in Attachment G relate to the required Cost Proposal elements?

Each proposing vendor may choose which method(s) work for their organization.

56. Section 1.1.2.7 What type of employee benefits are tracked through this program?

None.

57. Section 2.1.3 This section indicates there is a requirement for in state contact. Does this require the FMS to employ an in state employee?

No.

58. Section 2.1.3 What is the anticipated number of in person meetings per year?

Not required.

59. Section 2.4 Is the cost of the background checks included in the FMS fee?

No, it is included in the participant's budget as a one-time purchase.

60. Section 2.4 Are background checks required annually or at the time of hire?

Background checks are required at time of hire.

61. Section 2.4 What background checks are required?

Developmental Services – Families decision if they choose to require background checks.

Background checks are required for those who deliver direct service.

62. Section 2.4 What is the cost for the background checks?

The current fee for background checks is $26.00.

63. Section 2.4 Is the cost for workers compensation included in the FMS fee or included in the consumer's budget?

Workers compensation is included in the consumer's budget.

64. Section 2.4 Is the existing workers compensation policy an individual or group policy?

Individual.

65. Section 2.6.1.4 This section indicates the reconciliation report per the respective regional center. How many regional centers will the FMS work with during this contract?

Three.

66. Section 2.6.1.8 Indicates reports to be provided for each consumer by region. How many regions are included across all of the programs?

Three.

67. Section 2.8.6 Please describe the current orientation and skills training program and the expectations of the FMS?

Orientation and skills training are provided by State staff.

68. Section 2.8.9 This section indicates the consumer can choose a representative to assist with budget management. Can the consumer appoint someone else to be the employer of record.

Yes, the designated representative can be the employer of record if designated by the participant.

69. Section 2.10.2 What would be required of the FMS for cost reporting?

Monthly, quarterly, and annual participant reports are required.

70. Section 5.1.1 Indicates invoices are paid within 45-60 days of receipt. Is this payment timeline for FMS and service fees? If no, please explain the process for invoicing for services and FMS fees.

This is the payment timeline for FMS and service fees.

71. Cost Proposal Document #1 reads: FMA rates shall be based on any one of any combination of the following models that results in the most cost effective purchase of services by the participant. Can you confirm this means the FMS can either choose one of the options or any combination of the options listed?

Each proposing vendor may choose which method(s) work for their organization.

72. Who is the current FMS provider?

The current FMS provider is Palco.

73. Does the state have a current turn over plan with the existing FMS?

Yes.

74. If no turn over plan exists is the FMS required by contract to provide the necessary documents and information needed to a new vendor?

Yes.

75. What is the current fee for FMS services?

The current fee is $42 per month per participant.

76. How many consumers are enrolled in each program?

The VD-HCBS Program currently has 1 participant enrolled, expansion of up to 30 participants is expected within the next year.

77. What is the anticipated growth in consumers over the term of the contract including the one year renewal?

The VD-HCBS program is expecting to expand to up to 30 participants within the next year.

78. How many employees are enrolled in the program?

The VD-HCBS program currently has 1 employee enrolled.

79. How many W-2s were issued for 2016?

155.

80. How many 1099s were issued for 2016?

38.

81. What is the average amount paid by the FMS each payment cycle?

Approximately $53,000.

82. How will the FMS receive the approved budgeted amount for the consumer?

The participants approved spending plan will be faxed or emailed to the FMS provider.

83. Will any funds be advanced to the FMS or will the FMS be required to pay for the consumer's payroll and vendor payments in advance and be reimbursed?

Pay in advance and be reimbursed.

84. What are the estimate number of existing participants and the growth projections for each program?

The VD-HCBS Program currently has 1 participant enrolled, expansion of up to 30 participants is expected within the next year.

85. Is there a cap / waitlist for either of the programs?

The VD-HCBS anticipates a cap of up to 30 participants in the next year. There is no waitlist for the program.

86. What are the fees currently paid to the Financial Management Services vendor for each program?

The current fee is $42 per month per participant.

87. What is the total monthly service payment amounts paid to providers and suppliers for each program?

The State-funded Self-Directed program pays $450 per month

88. 4. Cost States: The actual service rate charged to the participants" Can you clarify? Is this an administrative service or a service to the participant / out of their budget?

The State does not understand the question.

89. 2.3.3 Mentions a regional authorization for any expenditure over the authorized budget. Can you clarify what is meant by this and a bit more about the process?

Developmental Services – This process will mirror the process for establishment of authorizing each individual's budget.

If a recipient requests an additional expenditure above the monthly allotment, the recipient would work with the assigned service coordinator on this request. Approval would be done through the Regional Center and authorization sent to the FI.

90. 2.3.4 Can you tell us a bit more about the non-labor related expenses such as, the items, vendors, current established processes?

Non-labor related expenses include any items that are supposed in the state's program policy handbook, which include a range of activities to assist the child, such as behavioral support and therapy, amongst others. The service is provided and the invoice is submitted to the Contractor for payment after delivery of services. Once paid, the Contractor invoices the State.

91. 2.4 Who is responsible for the cost of Criminal Background Checks (CBC)?

Background checks are paid from the participant's budget as a one-time purchase.

92. 5.2.3: Can you tell us a bit more about the procurement card that is sometimes issued and how this is used / billed?

Not applicable to this RFP.

93. 2.4 Is transport a separate service that providers can submit time for and is it included as a unique service in the participant budget?

No, it is not a service that providers can submit time for through the State-funded Self-Directed program.

ALL ELSE REMAINS THE SAME FOR RFP 3459.

Vendor must sign and return this amendment with proposal submitted.

Vendor Name: Guardiantrac, LLC d/b/a GT Independence

Authorized Signature: John A. Carmichael

Title: Chief Executive Officer Date: 9/6/17

This document must be submitted in the "State Documents" section of vendors' technical proposal.

February 26, 2016

Christopher Taylor
GuardianTrac, LLC
215 Broadus Street
Sturgis, MI 49091

Dear Mr. Taylor:

It is my pleasure to inform you that GuardianTrac, LLC has been issued CARF accreditation based on its recent survey. The Three-Year Accreditation applies to the following service(s):

Community Employment Services: Employment Supports
Community Employment Services: Job Development
Self-Directed Community Supports and Services: Employer of Record for Support Services
Services Coordination
Supported Living

This accreditation will extend through November 30, 2018. This achievement is an indication of your organization's dedication and commitment to improving the quality of the lives of the persons served. Services, personnel, and documentation clearly indicate an established pattern of conformance to standards.

The survey report is intended to support a continuation of the quality improvement of your organization's service(s). It contains comments on your organization's strengths as well as any consultation and recommendations. A quality improvement plan (QIP) demonstrating your organization's efforts to implement the survey recommendation(s) must be submitted within the next 90 days to retain accreditation. The QIP form is posted on Customer Connect (*customerconnect.carf.org*), CARF's secure, dedicated website for accredited organizations and organizations seeking accreditation. Please log on to Customer Connect and follow the guidelines contained in the QIP form.

Your organization should take pride in achieving this high level of accreditation. CARF will recognize this accomplishment in its listing of organizations with accreditation and encourages your organization to make its accreditation known throughout the community. Communication of the accreditation to your referral and funding sources, the media, and local and federal government officials can promote and distinguish your organization. Enclosed are some materials that will help you publicize this achievement.

Your organization's complimentary accreditation certificate will be sent separately. You may use the enclosed form to order additional certificates.

If you have any questions regarding your organization's accreditation or the QIP, you are encouraged to seek support from Sandra Edge by email at sedge@carf.org or telephone at (888) 281-6531, extension 7066.

CARF International Headquarters
6951 E. Southpoint Road
Tucson, AZ 85756-9407, USA

www.carf.org

CARF encourages your organization to continue fully and productively using the CARF standards as part of its ongoing commitment to accreditation. CARF commends your organization's commitment and consistent efforts to improve the quality of its service(s) and looks forward to working with your organization in its ongoing pursuit of excellence.

Sincerely,

Brian J. Boon, Ph.D.
President/CEO

Enclosures

Section V – Scope of Work

2.1.1 The successful vendor for the role of Financial Management Services must prepare and maintain a comprehensive FMS Policies and Procedures Manual which reflects all tasks performed by the FMS and required by ADSD. It will include a description of the internal controls that will be used to monitor the FMS performance of its tasks. It will also demonstrate a high level of participant choice and autonomy and afford the highest level of participant directed activities related to the support services to participants by the FMS. The FMS will update the manual on a periodic basis as needed. It is also recommended that the manual be developed in an automated/read only format so that FMS staff can readily access it.

GT Independence has developed a comprehensive Policy and Procedures Manual. The manual reflects all company policies and includes all FMS tasks. Policies and Procedures cite appropriate references including State and Federal Laws and definitions of key terms. The manual describes the applicable internal controls for each policy and procedure.

GT will develop State of Nevada program specific policies and procedures once the contracting process has finished.

GT quality assurance and compliance staff update the manual regularly. Please see Attachment A - Policy and Procedures Table of Contents

2.1.2 The successful vendor will describe the physical environment in which the FMS will perform the requirement of this RFP. This would include, but not be limited to:

2.1.2.1 The location of the office(s) where the work will be done and records kept;

GT Independence will staff personnel at our headquarters in Sturgis, Michigan to perform all operational duties required to implement the contract. The physical location of GT Independence headquarters is 215 Broadus St, Sturgis, MI 49091. Personnel staffed at this location will include customer service associates, billing, tax, payroll associates, and contract management staff.

2.1.2.2 Adequacy of space available to store current and achieved files in a confidential and secure manner; and

GT maintains physical facilities for file storage in line with our Recordkeeping Policy. All file storage facilities have appropriate security and disaster prevention measures in place. Access to physical files is limited based on role and all files are kept behind two locks per applicable security guidelines.

GT currently has access to 4 buildings in Sturgis, MI for a total of 35,000 square feet. Our facilities team tracks occupancy levels and available space. There is enough available space for significant growth.

Please see Attachment B - 6-05 Record Management

2.1.2.3 A description of the informational system, software, equipment and other technologies that will affect the contract and/or this procurement.

GT Independence operates a highly customized, technologically robust information system. The system has been primarily developed in house and is currently maintained by the IT team which consists of 3 on staff developers, a systems administrator, 2 systems technicians and a Director of IT. The system has the following capabilities:

<u>Enterprise Management</u>

The company's Enterprise system, Datatrac™, stores all of the necessary data to perform FMS functions including:

- ***Participant Demographics***
- ***Participant Authorizations, Service Plans, and budgets***
- ***Employee Demographics***
- ***Employee Assignment data including rate of pay and service type authorized for each employer***
- ***Utilization Data***
- ***Payroll Data***
- ***Billing and Claims Data***
- ***Program Specific Business Rules***
- ***Issuance of Payroll Payments***
- ***General Ledger Management***

The system was custom built for GT by its own developers.

<u>Web Portal</u>

GT Independence completed development of a robust online portal to serve Participants, caregivers and agency personnel in 2015. The portal was designed to provide a high level of functionality for users and real time access to documents and reports. The portal was built to the highest HIPAA compliant standards to ensure complete data security for all those served and is completely responsive to work across all web enabled devices. The portal offers access to many features that allow participants/representatives, workers and care coordination staff to conveniently access GT's services.
Some of the functionality available in the portal is as follows:

Participants/Representatives

- ***View and download current and past budget reports***
- ***View and download employee paystubs***
- ***Enter and approve employee online timesheets***
- ***Find new caregivers***
- ***Download program specific documentation***
- ***Contact GT customer service department with questions and requests***

Caregivers

- ***View and download paystubs and W2s***
- ***Download personalized timesheets***
- ***Enter and submit online timesheets***

- ***View current payroll schedules***
- ***Download program specific documents***
- ***Contact GT customer service department with questions and requests***

Agencies (Regional Center Staff, State Staff)

- ***View aggregate budget reports for Participants***
- ***View detailed current and past Participant budget reports***
- ***View all paid timesheets by participant***
- ***View / Print / Download lists of available local caregivers***
- ***Submit new Participant referral to GT***
- ***Access program specific documents***
- ***Contact GT customer service department with questions and requests***

System Hardware

GT's IT team manage system hardware to ensure that the company's information systems are stable and can maintain a high level of performance and availability. System Hardware Assets include:

- ***Multiple Server Hosts***
- ***Data storage devices***
- ***Networking Equipment and cabling***
- ***Personal Computers***
- ***Printers***
- ***Fax Servers***
- ***Mobile Devices Including Cell Phones and Tablets***

Backup Systems

GT makes daily offsite backups of company data. During the work day, the company employs a cloud based backup system that captures data in 15 minute intervals.

See Attachment C - IT Disaster Recovery Plan

2.1.3 Although it is not required that the successful vendor be headquartered in the State of Nevada, it is required that they have in-state contact with applicable agencies. Vendor cannot provide Fiscal Employer Services to a child for whom it also provides a direct service funded by ADSD.

GT Independence will hire and employ a Field Service Representative(s) in the state of Nevada to provide face-to-face service to participants / vendors and to meet with and provide support to State personnel and program stakeholders.

2.1.4 The successful vendor will present a Quality Management Plan that ensures all responsibilities in this RFP are accomplished within required time periods and according to best practice for participant-directed payroll and tax management services and other tasks required in this RFP. This plan should be periodically reviewed to evaluate effectiveness in meeting responsibilities. The Quality Management Plan should contain clarified, defined goals and standards for each service or responsibility.

GT will present a complete Quality Management Plan upon implementation of the contract. Generally, we view delivery of services as a three-part process:

<u>Contracting</u> – Document the agreement between GT and ADSD. GT will designate a liaison to work through the execution of a contract and ensure that the contract captures the agreed upon terms.

<u>Implementation</u> GT will develop an Implementation plan that identifies necessary setup activities related to contract (RFP) requirements. The company will designate an implementation lead who will track implementation steps with a customized Business Development checklist. Implementation is complete when the setup activities on the checklist are complete and the company is fully operational.

<u>Quality Management</u> GT will develop a Quality Management plan that identifies service levels for required functions along with measurement techniques and reporting frequencies. Here is an example:

Function	*RFP Requirement*	*Service Level*	*Measurement Technique*	*Reporting Frequency*
Participant Enrollment	***2.2.3 – 2.2.6***	***GT Staff shall obtain a completed enrollment packet within ten (10) business days of referral for 98% of referrals***	***Verify via Field Service Representative Checklist***	***Monthly***

GT will seek approval for the QM plan and present regular reports against the plan. GT will consult regularly with program staff and seek participant feedback on the effectiveness of quality management efforts and make changes to the plan as necessary.

2.1.5 The FMS shall meet with the representative from ADSD and ADSD regional representatives immediately after the awarding of the contract. At this meeting all aspects of program startup and operation shall be discussed and reviewed including initial training in the waiver-related ADSD procedures, budget guidelines and cost standards. ADSD will establish with the awarded vendor(s) a regular set of meetings and/or telephone conferences at least quarterly or more often as needed to assess the progress of the contract.

GT Independence values collaboration in all of its working relationships. GT will designate appropriate staff members to liaise with ADSD staff and communicate on the various planned implementation steps at the initial meeting and regular follow up meetings. GT staff will make themselves readily available during implementation. We will collaborate with the incumbent FMS provider to facilitate a smooth transfer of services for program participants. We will focus on ensuring that payments are not interrupted for workers as we complete the necessary setup functions.

2.2 RESPONSIBILITIES

The Financial Management Service is responsible for the following:

2.2.1 Federal and State Approval to be a Financial Management Service.

GT has met the requirements to perform as a Financial Management Service at the Federal and State levels for each contract it currently serves. GT is staffed by multiple CPA's and attorneys. We are familiar with IRS Revenue Procedure 70-6 as modified by Revenue Procedure 2013-39 (Designation of Agent by Application), under Section 3504 of the IRS code. The company has been operating as a Financial Management Service under these regulations for 13 years. We currently serve 9 states and roughly 13,000 employers.

GT will obtain approval from the State of Nevada to deliver FMS services as applicable.

2.2.2 Demonstrate it has a separate Federal employer identification number (FEIN) specifically to file Internal Revenue Service (IRS) Form 2678 and selected tax forms on individuals' behalves.

GT Independence maintains a separate FEIN specifically for filing IRS Form 2678, Employer Appointment of Agent and other federal tax forms and for filing and making federal tax payments on the behalf of individuals.

Guardiantrac FEIN: 32-0112072

Separate FEIN for filing as payroll agent: 01-0881657

2.2.3 Must have an enrollment packet that contains information about the agent's services and operations, Federal and State forms the individual must complete, sign and return to the agent to use agent services (e.g., IRS Form SS-4, 2678, 8821), examples of expenditure reports and information to explain these reports, and other applicable consent and agreement forms. The required enrollment packet will include ADSD forms and information (employee application, fact sheets, provider qualifications, individual provider, applicable Individual Support Procedures and other information ADSD deems necessary).

GT Independence maintains an Individual-Employer Enrollment Packet that contains information about F/EA FMS services and operations including all federal and state forms that the individual must sign and other applicable consent and agreement forms.

Upon contract award, GT Independence will submit an Individual-Employer Enrollment Packet to ADSD for approval which will contain at minimum the following items:

- ***IRS Form SS-4***
- ***IRS Form 2678***
- ***IRS Form 8821***

- ***NUCS 4556 State of Nevada Power of Attorney Authorization***
- ***Privacy Notice***
- ***Payroll Schedule***

2.2.4 Will have a system to distribute and explain the enrollment packet, and collect, review, process, and maintain required forms.

Soon after contracting and before most of the transition process is complete, GT will develop enrollment packets for Consumers and Workers. GT will review the content of current packets and determine which items need to be changed based on the change in F/EA providers. Once the packet contents are defined, the GT implementation team will:

- ***Draft packet documents and submit to ADSD for approval***
- ***Integrate approved documents into an electronic fillable form***
- ***Integrate packets into GT's e-enrollment system which allows complete enrollment through a mobile device***
- ***Integrate packets into GT's document management system which allows automated processing of enrollment data into the GT information system.***

The enrollment process is completed through three different departments at GT. Supports brokers obtain completed enrollment packets and transmit them electronically to our system. The operations team receives the packets which contain the necessary documents for obtaining approval. They process the documents, sending the appropriate requests to State and Federal taxing authorities. The accounting department receives confirmation of the completed process and begins acting as F/EA.

2.2.5 Will have policies and procedures for preparing, distributing, collecting, and processing information contained in the individual enrollment packet.

GT Independence has policies and procedures in place for preparing, distributing, collecting, and processing individual enrollment packets. See Attachment D - 6-12 Consumer Enrollment Meetings and Attachment E 6-16 Consumer Intake.

2.2.6 Will have internal controls to monitor the preparation, distribution, collection, and processing of information contained in the individual enrollment packet.

GT Independence has developed internal controls to monitor the enrollment packet process. We have developed system markers to identify when packets have not been fully completed and to prompt Field Services Staff to finish the enrollment process. GT's quality and compliance team audit enrollment checklists to determine that the enrollment process is consistently completed timely and accurately.

2.2.7 Will have a system for obtaining an FEIN for each individual it represents and for maintaining copies of the IRS FEIN notification letter and the filed Form SS-4, request for FEIN.

GT Independence Field Service Representatives obtain a signed copy of IRS Form SS-4 during the initial face-to-face enrollment meeting. GT Independence Customer

Service Associates obtain a federal employer identification number for each individual it represents as part of the state specific enrollment process. Copies of all individual's FEIN and filed IRS Form SS-4 are maintained in the individual's HIPPA compliant file electronically in our secure database and physically at GT Independence headquarters by Customer Service Associates.

2.2.8 Will have a system for retiring individuals' FEINs when they are no longer employers.

Upon notification of termination from the State Agency, GT Independence initiates a termination process outlined by an individual termination checklist. The checklist lists all required activities for terminating an individual's registration as an employer. The process includes activities required to terminate a FEIN. Once a Customer Service Associate completes the checklist it is reviewed by the Customer Service Associate Team Leader. Team Leaders review the inactive client list each month to make sure that terminations are prepared in a timely manner.

2.2.9 Will have a system for preparing and submitting a signed IRS FORM 2678: Appointment of Agent Form and request for Approval Letter to IRS for each individual it represents. Copies will be maintained in each individual's file.

GT Independence obtains a signed copy of the Form 2678, Employer/Payer Appointment of Agent during the initial face-to-face enrollment meeting. GT Independence develops a document checklist for each State or Agency that it has a relationship with. The checklist reflects all of the documents for a person to register with the State in which they reside and with the Federal government, (IRS, Homeland Security, Social Security) It also identifies the steps required to file each required document.

2.2.10 Is required to have written authorization from the IRS to be the agent for each individual.

GT Independence receives written authorization from the IRS to be the agent for individuals it represents through IRS Letter 1997C. Customer Service Associates document and file individual IRS 1997C Letters in the individual's file with IRS Form 2678.

2.2.11 Will complete and file the appropriate State forms to be recognized by the State unemployment and income tax agencies to be a fiscal agent for ADSD individuals.

GT Independence will include form <u>NUCS 4556 Power of Attorney</u> in the employer packet[1], and ensure that the document is included in the policy and procedure as well as the file order and checklist documents. GT will include instructions in the checklist for submitting the document to the State of Nevada as instructed on the form.

[1] See the proposal response to RFP Section 2.2.3 above

2.2.12 Will have written policies and procedures for obtaining a FEIN, maintaining the FEIN notification letter and the filed form SS-4, retiring individual's FEIN, for submitting IRS FORM 2678, and Request to Be the Agent letter.

GT Independence maintains a procedure in our policies and procedures manual for obtaining a FEIN and filing an IRS 2678 for each individual it represents. Copies of all individual's FEIN, filed IRS Form SS-4, filed IRS Form 2678 and received IRS Letter 1997C are maintained in the individual's HIPPA compliant file electronically in our secure database and physically at GT Independence headquarters. See Attachment E – 6-16 Consumer Intake.

GT Independence maintains written policies and procedures for retiring individuals' FEINs in a timely manner when they are no longer employers. See Attachment F - 6-18 Consumer Termination

2.2.13 Will have internal controls to monitor the FEIN process, monitor IRS Form 2678, request for approval and revocation process in accordance with IRS requirements, to monitor that it has received approval to be agent for all individuals it represents, and maintains all relevant documents.

Customer Service Associates complete and maintain checklists incorporating the FEIN process, including receipt and retirement of individual's FEINs and; the preparation and submission and revocation of IRS Forms 2678. Operations Team Leaders review each checklist to ensure process integrity. See Attachment E 6-16 Consumer Intake and Attachment F – 6-18 Consumer Termination.

2.2.14 Will have a system in place to file a signed IRS Form 8821, Tax Information Authorization with the IRS for each individual it represents in order to communicate with the IRS on the individual's behalf regarding FUTA issues and to maintain copies of the Form in each individual's file, and a system in place to revoke the IRS Form 8821 for each individual when the agent no longer represents the individual and to maintain the relevant documentation in each individual's file.

GT Independence maintains written policies and procedures and provides training to Customer Service Associates regarding policies and procedures for preparing and filing IRS Form 8821 and for maintaining copies of the form in each individuals file. See Attachment S 6-16 Consumer Intake and Attachment X 9-01A Alabama Packet Processing Checklist.

2.2.15 Will have written policies and procedures for submitting initial IRS Form 8821 to the IRS and for maintaining copies of the Form in each individual's file and policies and procedures for revoking the IRS Form 8821 when the agent no longer represents the individual and for maintaining the relevant documentation in each individual's file.

GT Independence maintains written policies and procedures and provides training to Customer Service Associates regarding policies and procedures for preparing, filing and renewing IRS Form 8821 and for maintaining copies of the form in each individuals file. See Attachment E - 6-16 Consumer Intake and Attachment G - 6-41 Renewal of Required Federal and State Forms

2.2.16 Will have internal controls documented and in place to monitor the process for obtaining, renewing, and revoking IRS Form 8821 and maintaining the relevant documentation in each individual's file.

GT Independence Customer Service Associates complete checklists relating to filing, renewal and revocation of IRS Forms 8821, including the receipt of approval and the IRS revocation notice. Review of each checklist is completed by the Customer Service Associate Team Leader.

2.3 MANAGEMENT OF ADSD INDIVIDUAL BUDGET FUNDS

The Financial Management Service to provide the following:

2.3.1 A system to receive, document, file, and maintain each ADSD authorized individual's budget.

GT's system has the capacity to capture individual budget information in a number of ways.

1. ***During the business development process, GT will identify a process for receiving service authorizations through data transfers, ftp submission or fax. GT will can automatically import service authorizations through a data feed into the system.***

2. ***GT can also capture authorizations by manually entering authorization data received through fax or ftp transfer into its information management system.***

3. ***GT can receive and store individual service plans via fax or ftp transfer. GT has a document management system that can easily index and track individual service plans by participant.***

4. ***GT has a system for developing a web based individual budget tool that can be used by GT Field Staff, Supports Coordinators or Participants to calculate budget***

items and rates including rate of pay with applicable taxes for consumer hired employees. These budgets can be stored electronically in the GT system.

2.3.2 A system in place to receive and disburse individuals' State budget funds and track budget funds received, disbursed and any remaining balances for each individual budget and in the aggregate.

GT is able to receive, disburse, and track budget funds individually and in the aggregate in multiple ways:

1. ***Receiving Funds- GT is able to produce claims data for request of reimbursement of program funds by individual (via EDI 837 claims file or other data format, via submission of paper claims files or via manual entry into a web based claims system). The company has a system for receiving electronic or paper remittance data and recording receipts by individual.***
2. ***Disbursing Funds- GT is able to disburse and record funds by individual based on service documentation submitted by employees or vendors.***
3. ***Tracking Funds- GT has a system for reconciling funds disbursed to funds received and tracking remaining balances by individual and in the aggregate. GT has the capacity to provide individual and aggregate reporting to track funds.***

2.3.3 A system to monitor expenditures and will alert individual and support broker/service coordinators of any variance in expenditures including over-expenditures. The FMS will also get regional authorization for any expenditure over the authorized budget amount.

GT has a system to monitor expenditures and provide alerts of variance. During implementation, GT staff will work with ADSD and/or Regional Center staff to establish utilization management parameters which will include procedures for handling over and under utilization of budget funds as well as unauthorized use of funds. Based on the parameters, GT will take the appropriate action regarding authorization of payment and notification.

GT's system has the ability to check disbursements against utilization rules in real time to ensure that overpayments are not made. GT can produce real time utilization reports through the company's web portal.

2.3.4 Will process all non-labor related invoices, including payment to vendors as specified (according to the Authorized Budget) by the individuals and/or their representatives, if applicable.

GT has a system to produce non-payroll payments to vendors and to incorporate utilization management procedures into vendor payments.

2.3.5 The FMS assumes all liability for overpayment of any individual budget, unless prior authorization is obtained from the ADSD.

Confirmed

2.3.6 Have policies and procedures for receiving and disbursing individuals' State budget funds and tracking individuals' budget funds received, disbursed, and any remaining balances for each individual and in the aggregate.

GT has policies and procedures in place to receive, disburse and track budget funds and balances. See Attachment H - 6-33 Agency Access to Electronic Documents and Attachment I - 6-20 Monthly Consumer Reports

2.3.7 Have internal controls in place to monitor the receipt and disbursement of budget funds and any remaining balances for each individual.

The activities of receiving funds are separated from the process of disbursing funds. All funds received are reviewed by appropriate claims and reimbursement team members. Received funds reports are reviewed by the Chief Financial Officer. Disbursements are executed exclusively by payroll team members who do not have access to cash receipts. All disbursement activities are reviewed by the appropriate payroll team leader and the Chief Financial Officer.

Duties for disbursement of funds are further segregated within the payroll department. The processor who keys disbursements is not allowed to initiate the check/ACH transaction. Service documentation is compared to disbursements to ensure that disbursements match documentation. Payroll team leaders use checklists with totals to ensure integrity throughout the disbursement process.

Billing staff review disbursements in a system-generated payroll and vendor report and reconcile claims against the report. Billing team leaders review reconciliation reports to ensure that billing is accurate.

The system produces utilization management exception reports to flag potential over/under-utilization. Payroll team leaders use checklists to determine that the process has been completed accurately.

2.3.8 A system to verify that the service/support/product billed for is in the approved budget prior to making payment.

GT's payment system is designed to not allow payments to be made if an authorization is missing. Service documentation must clearly identify an authorized service before the system will allow the payment to proceed.

2.4 PAYROLL PROCESS

Prior to employment, FMS as applicable and required, will assist individuals or families with securing Criminal History Background Checks (CHBC), employer-employee agreements provided by the ADSD, obtaining worker compensation insurance for the direct service and support employees, and obtaining license and vehicle safety checks for employees who provide transportation.

During the implementation phase, GT will establish an employee eligibility policy for the program. The policy will include employee requirements related to:

- ***Criminal Background Checks***
- ***Vehicle Safety and Driving Record Checks***
- ***Training Requirements***
- ***Restrictions on Relationship to Person Served (i.e. family relationship, guardian, power of attorney, etc.)***

The policy will identify restrictions based on these factors and the associated procedures to follow when employees do not meet eligibility requirements.

GT will incorporate employer/employee agreements in the employment packets

GT will establish a worker's compensation policy based on State and Program requirements. GT establish a mechanism for assisting the employer in obtaining worker's compensation insurance as applicable.

The Financial Management Service will provide the following:

2.4.1 A system to produce employment packets for individuals' employees which contain all the required forms, information, applications, and agreements and consent documents needed to enroll individuals as individuals' employees (e.g., employment application, IRS Form W-4, IRS Notice 797).

GT will develop an employee packet for use in the program. The packet will contain all required tax forms, human resources forms, registration documents, instructions and agreements. The packet will at minimum include the following items:

- ***USCIS Form I9***
- ***IRS Form W-4***
- ***Background Check Consent Form***
- ***Employment Agreement***
- ***Preferred Payment Method Form***
- ***Payroll Schedule***
- ***Timesheet Instructions***

2.4.2 A system to collect, process, and maintain the required human resources documentation from individuals and workers in order to process payroll for workers.

GT will make its E-enrollment System available for use. For employees who will be hired at the same time that consumers enroll in the program, GT Field Services Staff will assist

with completion of packets through in home visits using a mobile device. Employees will complete the necessary documents electronically. The documents will be pre-filled for ease of completion. Employees will receive copies of every document they sign. Employees will also receive instructional material including timesheets with instructions for submission, a payroll schedule and a guide for completing timesheets according to program rules.

For employees who are newly hired by participants who have already enrolled, the enrollment packet and materials will be available online. Participants will notify GT customer service staff that a new employee wishes to enroll, GT staff will then setup the E-enrollment and assist the employee with completion of the packet as necessary.

Once completed, the employee enrollment packet will be uploaded directly into GT's information system. An operations team member will review the uploaded data to ensure that it is complete. If any data is missing, the employee will be pended in the information system and GT operations team members will follow up on missing documentation. Employees who have a pending status in the GT system cannot be paid until they complete the required documents.

GT's information system will flag documents with expiration dates and GT operations staff will notify employees and collect renewals as appropriate. Failure to provide renewed documentation can lead to a system flag which can lead to payment restriction.

Completed employment packets are stored electronically in the company's document management system and can be referenced easily. For employees who are not able to access employee packets online, GT will send paper enrollment packets.

2.4.3 A system to obtain an IRS Form W-4 from each worker it processes payroll for and will maintain a copy of the form in the worker's file.

IRS W-4 forms will be included in the employee enrollment packet and will be collected, stored and maintained in the manner described above.

2.4.4 A system to obtain an IRS Form W-5 from each eligible worker it processes advanced Earned Income Credit (EIC) for and will maintain a copy of the form in each worker's file.

The W5 form has been discontinued because the Advanced Earned Income Credit was repealed in 2010.

2.4.5 A system to verify workers' citizenship and alien status by collecting and maintaining completed Bureau of Citizenship and Immigration Service (BCIS) Form I-9 for every worker it processes payroll for and will maintain a copy of the form in each worker's file.

I9 forms will be included in the employee enrollment packet and will be collected, stored and maintained in the manner described above.

2.4.6 A system to pay workers in compliance with Federal and State Department of Labor wage and hour rules.

GT has systems for ensuring that payroll services comply with Federal and State labor laws. GT has systems for staying up to date with changing labor laws.

Generally, minimum wage and overtime rules apply to workers in self-directed arrangements. However there can be exceptions:

- ***The employment arrangement sometimes qualifies for the companionship exemption.***
- ***Certain workers who are live-in are sometimes exempt.***
- ***Sleep time can be exempt from pay in many cases***

GT will provide guidance on Fair Labor Standards Act implications of program parameters, particularly with respect to joint employer status for Regional Centers, the State and GT.

2.4.7 Will distribute, collect and process all workers' biweekly time sheets.

GT will prepare and distribute timesheets with instructions. Participants and workers can request timesheets from our customer service department or print them from the GT portal.

Workers can submit timesheets electronically through the GT portal or by faxing, emailing or mailing copies of timesheets to GT.

GT will publish and send a payroll schedule to workers. Timesheets must be submitted by the due date. Late submissions will be processed on the next pay period. Timesheets that are submitted with errors will be rejected. Workers will be asked to re-submit. In most cases workers are able to be paid on time if they re-submit their timesheet with corrections.

GT Operations staff will enter timesheet data in the information system. The system will prevent unauthorized services from being paid.

Payments will be issued on time according to the published payroll schedule.

2.4.8 Will process all judgments, garnishments, tax levies or any related holds on an employee's funds as may be required by local, state or federal laws.

GT has a system for administering notice of judgements, garnishments, tax levies and other payroll encumbrances per applicable laws.

2.4.9 A system to track and report on new hires per agreed upon reporting procedures with the ADSD.

GT will include the new hire reporting form in the employee packet. (http://ui.nv.gov/PDFS/NewHireRptForm.pdf). The form will be submitted to the State as the new employees are processed in GT's system per the instructions provided. The instructions will be recorded in the processing checklist.

2.4.10 A system for withholding and filing IRS Forms 941 Federal Insurance Contributions Act (FICA – Medicare and Social Security taxes and federal income tax withholding) quarterly in the

aggregate with its separate FEIN for all individuals it represents and will maintain a copy of each IRS Form 941 filed in the FMS' files.

GT's information system calculates Federal withholding and FICA tax based on information provided by the worker including form W-4 and relationship status disclosures. The system is able to generate reports that are used to confirm withholding amounts and produce the required data for filing form 941 and the attached Schedule R and Schedule B.

GT produces a paper copy of the 941 and related schedules and submits the copy via certified mail to the IRS. GT keeps a copy for the file.

2.4.11 A system for paying FICA and Federal income tax withholding in the aggregate for all individuals it represents using the FMS' separate FEIN and for maintaining relevant documentation in the FMS' files.

GT has a system for paying FICA and Federal income tax according to regulations. GT accounting staff calculate the required payment frequency and total liability for FICA and Federal income tax after each payroll disbursement is completed. GT staff submit payment via electronic funds transfer (IRS EFT system). When we submit the funds via EFT we use our separate FEIN to record the deposit within the IRS system. GT records the receipt of confirmation from the IRS along with the supporting payroll data from GT's information system.

2.4.12 A system for withholding and filing an IRS Form 940 for each individual it represents using the individual's FEIN annually in an accurate and timely manner and maintaining the relevant documentation in the FMS' files.

GT has a system for filing form 940 using the company's separate EIN and attaching Schedule R to the annual 940 filing that details each individual's EIN.

2.4.13 A system for paying FUTA for each individual per IRS depositing rules and for maintaining the relevant documentation in the FMS' files.

GT makes quarterly estimated FUTA payments under its separate EIN. Quarterly payments are calculated based on estimated liability based on payroll data in the company's information system.

2.4.14 A system to manage federal Advanced EIC for each eligible worker in an accurate and timely manner and to maintain the relevant documentation in the FMS' files.

The Advanced Earned Income Credit was repealed in 2010, when President Obama signed the Education Jobs and Medicare Assistance Act into law.

2.4.15 A system for obtaining the appropriate State employer registration numbers for income and unemployment tax filing and payment purposes for all individuals' it represents and maintaining the relevant documentation in the FMS's files.

GT has a system for obtaining the appropriate registration numbers for income and unemployment tax filing.

Nevada does not have a State income tax. Therefore GT will only need to register for unemployment tax numbers by individual employer. GT will complete this registration by submitting the online application which can be found at: http://ui.nv.gov/ess.html

GT's accounting staff will complete the registration online for each employer when they meet the required wage threshold ($1000 in any quarter). GT's system will provide a report that identifies when each individual employer is required to submit a registration.

2.4.16 A system for withholding and filing State income tax (SIT) for all workers per State requirements and for maintaining the relevant documentation in the FMS' files, if applicable.

Nevada doesn't have State income tax.

2.4.17 A system for paying SIT withholding for each worker per State payment schedule and for maintaining the relevant documentation in the FMS' files, if applicable.

Nevada doesn't have State income tax.

2.4.18 A system for withholding and filing State unemployment insurance tax individually for each individual it represents using the individual's FEIN and /or his or her State employer registration number per State requirements and for maintaining the relevant documentation in the FMS' files.

GT has a system for administering unemployment tax. GT can withhold and file State Unemployment quarterly per State requirements. GT will produce a payroll report from the company's information system which will be used to calculate SUTA liability. Accounting staff will reconcile the unemployment filing to the company's payroll data to ensure accurate filing.

GT will file in bulk, by uploading individual employer data in a bulk file. Otherwise, GT has the capacity to enter individual tax reports electronically.

2.4.19 A system for paying State unemployment taxes for each individual-employer per State payment schedule and for maintaining the relevant documentation in the FMS' files.

GT submits payments via EFT as unemployment taxes are filed.

2.4.20 A system in place to pay individuals' workers within the time period required by the State Department of Labor (DOL).

As part of implementation, GT will research Nevada specific payroll requirements and design a payroll schedule that meets requirements for paying workers timely. GT will process payments according to the schedule.

2.4.21 A system for processing workers' direct deposits.

GT has the capacity to submit payroll payments via EFT directly deposited to a worker's bank account. GT collects bank account information at hire and verifies the information (usually via a voided check). GT can also provide pay cards that make payments immediately available upon issuance of EFT payment from GT's bank .

2.4.22 Will have written policies and procedures to address all payroll systems identified above and any other payroll system the agent uses.

GT has policies and procedures in place to ensure that applicable laws and regulations are followed and will ensure that any necessary Nevada specific policies and procedures are created to ensure full compliance with program or state specific laws and regulations. GT also has a policy and procedure manual regarding our internal processes. A separate chapter will be created for Nevada specific policies and procedures as well.

See Attachment J - 6-24 Processing Tax Filings, Attachment K - 6-32 Preparing Year End Tax Documentation, Attachment L - 6-25 Garnishments, Attachment M – Sample Payroll Schedule, and Attachment N - 6-03 Staying up to date with State and Federal Agencies

2.4.23 Will have internal controls designed to ensure that all payroll procedures are operated and managed as described in the policies and procedures.

Employee Eligibility

GT's system will be set up to include employee eligibility factors from the policy. The system will be configured to flag all employees who do not meet policy requirements. Flagged employees will not be able to receive payment through the system.

Worker' Compensation

GT will set up regular data integrity reports to identify active employers who do not have a worker's compensation policy number recorded in the system, or have an expired policy recorded in the system. GT will review missing worker's compensation issues to determine if a policy needs to be purchased.

Processing Garnishments, Levies, etc.

GT administrative staff record all mailed correspondence. GT accounting staff record payments made for payroll encumbrances in separate general ledger accounts and reconcile those accounts to payroll data. Accounting staff confirm that payments are made according to instructions provided on official documents.

Employee Enrollment

GT Operations Staff conduct processing according to processing checklists developed specifically for the program. Each employee packet is peer-reviewed before processing is considered complete. GT Quality and Compliance staff review data integrity reports to find missing information in GT's information system. GT Quality and Compliance staff conduct internal audits of files to confirm the presence of required documents as indicated by the employee file order document that is included in every file.

Calculating Federal Withholding, Filing Form 941

GT Accounting staff reconcile the 941 report to payroll data in GT's information system. GT confirms that withholding rates have been calculated properly. GT reconciles payments made against the liability information on 941 Schedule B. GT accounting staff

document these verifications on a quarter/year end checklist. The company's controller and CFO review and approve various steps in the process including production and mailing of the final report.

<u>Issuing Withholding Payments to the IRS</u>

GT accounting staff compare payroll data from GT's information system to calculated payments. Payments are approved by the Controller or CFO prior to submission to the IRS.

<u>Filing and Paying State Unemployment Tax</u>

GT accounting staff perform reconciliations of company data to potential filings. These reconciliations are recorded and entered on a master checklist. GT's Controller reviews and approve steps in the Unemployment Tax Filing process to confirm accuracy. In cases where GT are filing by entering individual data, the company keeps confirmation reports and compares to filing data that was generated through the payroll reconciliation process to ensure that manual filings were executed timely and accurately.

2.5 END OF YEAR FEDERAL TAX PROCESS.

The Financial Management Service will provide the following:

2.5.1 A system for refunding over collected FICA to applicable individual-employers and support service workers and for maintaining the relevant documentation in the FMS' records.

GT refunds over-collected FICA to employers and employees. Once the year has concluded, we generate a report that calculates FICA refunds owed by identifying which employees did not meet the FICA threshold. GT reduces FICA liability in our system by individual employee based on the report. GT calculates over-collected FICA and records a payable in the company's accounting system. GT issues FICA refund payments to employees.

GT will work during implementation to develop the procedure for refunding over-collected employer portion of FICA to the appropriate party.

2.5.2 A system for preparing and distributing IRS Forms W-2 for individuals' workers per IRS instructions for agents and electronic/magnetic filing when processing 250 or more IRS Forms W-2 and maintaining the relevant documentation in the FMS' files.

GT's information system captures payroll data that will populate W-2's. GT produces W-2 forms and compares them to year end 941 filings. GT mails W-2 forms to employees by the deadline (usually around January 31st). GT uploads W-2 data to the Social Security office under the company's separate EIN. W-2 data uploaded to Social Security matches Federal 941 filings.

2.5.3 A system to prepare and distribute IRS Forms W-3 in the aggregate for all individuals the agent represents per IRS instructions and maintaining the relevant documentation in the FMS' files.

Since GT files form 941 in the aggregate and uploads form W-3 under its own EIN rather than under individual EIN's, GT does not distribute W-3 forms to individual employers. GT retains the W-3 form submitted under the company's EIN for its records. The information on the W-3 matches the company's 941 filing.

2.5.4 Written policies and procedures for preparing and distributing and meeting all federal tax reporting requirements.

See Attachment O - 6-27 FICA Refunds and Attachment K - 6-32 Preparing Year End Tax Information;

2.5.5 Internal controls to monitor the federal end of year tax process.

The company meets in November to identify year-end tasks and setup a project and control checklist for the year end function. This project ensures communication between functional roles within GT and identifies appropriate timelines for year-end activities.

Part of the checklist function is to ensure that year-end tax filings are completed correctly, including FICA refunds. GT Accounting staff verify that FICA refund transactions were executed accurately based on payroll reports. Accounting staff adjust 941 filings based on FICA refund transactions.

2.6 REPORTS

2.6.1 The awarded vendor must produce a variety of reports which include:

2.6.1.1 Monthly expenditure reports for self-directed budgets;

GT currently processes monthly expenditure reports for all of the participants it serves and will similarly complete these reports for the ADSD. Our system provides us with the technology to upload budgets and track expenditures against these budgets based on the participants' utilization of their services. We then extract that information on a monthly basis into a report format that provides a number of useful fields for tracking expenditures including, but not limited to, total available budget, total usage, usage during the last month, and percentage of variance. These reports are mailed on a monthly basis to all participants and are also provided to Care Managers for review. The report will be formatted to meet the needs of ADSD.

Our online GT portal also allows participants to access expenditure information at any given time. The portal also allows different formats ranging from a simple view to a very detailed view depending on the needs of the participant.

GT Independence provides expenditure reports in a variety of customizable formats to meet unique program requirements. Below are two examples of budget report formats:

Monthly Statement

Reporting Period: from 02/01/2017 **to** 02/28/2017

Agency:

Vendor Number: 3418839

[redacted]

GT ID Number: 201024

GT EORID: 201024

BudgetID	*AuthorizationID*	*Auth Begin Date*	*Auth End Date*	*Billing Code*
266731	266731	11/1/2016	10/31/2017	S5130

Service Name	*Units Authorized*	*Unit Type*	*#Days in AuthPeriod*
S5130 - SHC Homemaker	2173	15min	365
Total Allowed Dollars	*Remaining Dollars From Previous*	*Spent This Period*	*Remaining Dollars*
$9,114.65	$7,404.52	$342.86	$7,061.65
Monthly Allowed Units	*Remaining Units From Previous*	*Units This Period*	*Remaining Units*
179.00	1764	82	1682
Units Allowed to Date	*Units Used to Date*		*Variance %*
572	491		14.16%

Allowed	572					2173
Used	491					2173

VDHC Monthly Spending Report: May 2017

Note: Complete gray areas below as needed.

Submit bill this month? (Y/N): Yes — Allow excess Personal Care hours this month? (Y/N): Yes

Veteran Name	[redacted]	**AAA or OC Contact**	[redacted]		**COMMENTS**
Veteran SSN		**VAMC Contact**			
Start Date	9/1/2016	**End Date if this month**			
Full Month Service Amt	$ 2,627.00	**Service Amt Remaining**	$ 31,524.00		
Monthly Admin Rate	$ 511.00	**Admin Amt Remaining**	$ 6,132.00		
Total Days in Month	31	**This Month Service Amount**	$ 2,627.00		

Planned & Backup Personal Services	**Employee / Agency**	**Unit Cost**	**Taxes & Workers Comp Owed**	**Units**	**Total**	**List Each Day of Service**
Personal Care	[redacted]	$ 12.00	$ 1.84	55.50	$ 768.30	1,4,5,8,11,12,15,18,19
Personal Care		$ 10.00	$ 1.54	15.00	$ 173.04	6,10,13
Personal Care		$ 10.00	$ 1.54	60.00	$ 692.16	2,3,4,5,9,10,11,12,16,17,18,19
Personal Care		$ 12.00	$ 1.84	6.00	$ 83.06	19,20
Personal Care			$ -		$ -	
Options Counselor's HV			$ -		$ -	
Day Care			$ -		$ -	
			$ -		$ -	
			$ -		$ -	
				Total	$ 1,716.56	

Routine / Planned Goods / Services & Specified / Emergency Savings	**Vendor**	**Unit Cost**	**Units**	**Total**	**COMMENTS**
	[redacted]	40	2	$ 80.00	
				$ -	
				$ -	
				$ -	
			Total	$ 80.00	

Total spent on Vet's care this month	$	1,796.56
Monthly admin oversight	$	511.00
Total Monthly Expenditure	$	2,307.56

List each day when Planned & Backup services were provided (e.g. Serv. Dates on UB-04	1,2,3,4,5,6,8,9,10,11,12,13,15,16,17,18,19,20	
Total # of different days when Planned & Backup services were provided		18
Daily rate for this UB-04	$	128.20

Emergencies/Savings This Month	$ 830.44	**Emergencies/Savings Balance at End of Month**	$ 3,031.23	**Max Emer/Savings**	$ 3,038.00
				Annual VDHC Budget Remaining	$ 27,100.44

2.6.1.2 Quarterly expenditure reports for all individual budgets;

GT will similarly provide a report on a quarterly basis that will provided expenditure information for the participant's benefit.

2.6.1.3 Annual reconciliation reports for each individual budget;

GT will provide an annual reconciliation report to each participant by pulling their usage information against their annual budget from our system. This report will reconcile their overall usage for that year against the budget.

2.6.1.4 Aggregate reconciliation report for the respective regional center; and

GT will also compile a reconciliation report of all pertinent data for each regional center by extracting the data from our system. This report will be molded to the ADSD's needs and provide an aggregate view of the data.

2.6.1.5 Demographic reports such as number of employees hired for a given period.

GT tracks the number of employees hired by participants on an ongoing basis. This information is input into our system. We will run a report based on the period in question to provide the number of new hires or other demographic information as requested.

These reports will be in an agreed upon format and sent to designated person(s) at each agency.

2.6.1.6 Expenditure reports

A. Name and ADSD#;
GT will provide the individual's name and ADSD number on each report for easy identification.

B. Amount of individual's monthly support funds for the current month by budgeted line item;
GT's expenditure reports will include a breakout of support funds for each month by budgeted line item.

C. All expenditures for the month by line item, including vendor name;
Also included in the expenditure reports will be line items for all expenditures including vendor names, where applicable.

D. Line item summary of budgeted amount, expenditures and balance;
GT will provide a summary for each line item which will indicate budgeted amount, expenditures, and balance.

E. Budget summary for all line items with budgeted amount, expenditures, and balance; and
Also provided will be a budget summary for all line items indicating budgeted amount, expenditures, and balance.

F. Total amount of budget remaining in the individual's account (managed by awarded vendor(s)) for the current period and year to date.
GT's report will show the total amount of the budget remaining for each individual's account.

2.6.1.7 Annual Expenditure reports

A. Line item summary of budgeted amount, expenditures and balance;
The annual expenditure reports provided by GT will include a line item summary of budgeted amount, expenditures, and balance.

B. Budget summary for all line items with budgeted amount, expenditures, and balance; and

The reports will include a budget summary for each and all line items which will include budgeted amount, expenditures, and balance.

C. Total amount of budget remaining in the individual's account (managed by awarded vendor(s)) for the current period and year to date.

GT's annual expenditure reports will include the total amount of the budget remaining in the individual's account.

2.6.1.8 Reconciliation Reports

Report of all consumers for each region by funding account with authorized budget amount, all expenditures for the budget period, and remaining balances.

GT's system is substantial and flexible in regards to the reports that it can process. Our system will allow us to pull a report of all consumers for a given region by funding account that will include authorized budget amount, all expenditures for the budget period, and remaining balances.

2.6.1.9 Demographic Reports

A. Number of people who self-direct their services by region;

GT can and will provide demographic reports as requested that will include the number of people who self-direct their services by region.

B. Number of employees hired directly by individuals and families;

GT will provide a report indicating the number of employees hired by the individuals and their families for a given time period as requested.

C. Workers compensation costs and claims; and

GT will provide a report on the costs and claims associated with Workers Compensation for the participants-employers.

D. Other reports required by ADSD.

GT will collaborate with ADSD on providing reports as requested. As mentioned, GT's reporting system is flexible and dynamic in its ability to provide reports.

2.7 INFORMATION TECHNOLOGY

2.7.1 The transfer of information between the vendor and the ADSD will be in a format determined by the ADSD. The awarded vendor must have, at a minimum, an IBM compatible

PC that will support the software needed to produce the reports prescribed by the Department with a secure internet connection.

GT Independence uses the latest relational database management systems and business intelligence technologies to transact and report data. Our expert Information Technology Reporting Team will customize reports to the desired format. We can provide automated data exchange using a number of different encrypted transport methods.

2.7.2 The awarded vendor is required to have a Disaster Recovery Plan for restoring software and master files and hardware backup if management information systems are disabled and for continuation of client payroll and invoice payment services.

GT involves multiple teams in the design, implementation and testing of our disaster recovery plan. Our goal is to provide high availability to all mission critical systems in any situation. GT's headquarters and datacenter have redundant power provided from batteries and a natural gas generator. Using cloud integration, our customer service lines and other communication systems are available from any location. GT currently replicates servers to an alternate facility in Sturgis, MI. The standby datacenter receives replicas of data and virtual servers throughout the day. Systems that contain the most critical information are priority and replication occurs at a higher frequency. Additionally, we use multiple methods to backup and test sensitive data and applications.

See Attachment C - IT Disaster Recovery Plan

2.8 CUSTOMER SERVICE SYSTEM

The awarded vendor must comply with the following:

2.8.1 FMS will have a customer service mechanism to respond to calls from individuals and their representatives, vendors and workers regarding issues such as withholdings and the net payments, lost or late checks, reports and other documentation received from the awarded vendor, or other questions regarding their services or payment of labor and non-labor related expenses.

GT Independence customer service teams provide excellent support to participants, their workers, program staff and other stakeholders in self-directed programs.

The company has earned an overall satisfaction rate above 96%

Customer Service representatives receive extensive training on handling common support issues. The team is responsible for delivering results that are measured with a broad set of quality measures to ensure maximum customer satisfaction and efficiency of service delivery. The table below provides examples of customer service metrics:

Performance Area	*Service Standard*	*Measurement Tool*
Phone Support	***Hold times shall not exceed 30 seconds on average.***	***Phone Center Software Report***
Open Service Requests	***Open Issues shall be resolved within 24 hours***	***Support Log***
Timesheet Support	***98% of timesheet exemptons shall be resolved by pay day***	***Rejected Timesheet Report***

Common service requests include withholdings, payments, lost checks, reports and other documentation as well as assistance with the new hire process, requests for access to more timesheets and other forms, requests for information like payroll schedules, instructions for completing timesheets and resolution of documentation issues.

GT's mechanism includes operating a toll free support center, making information available through the GT Portal, receiving after hours voicemails, receiving faxed and mailed correspondence, issuing communications through newsletters, receiving support requests through social media and placing outbound calls to address open issues.

GT closely manages staff/participant ratios to ensure that service levels meet standards. Customer service representatives operate in teams. Teams typically consist of 5 members and 1 team leader. Operations units consist of 3-5 teams.

2.8.2 Establish a statewide toll free number for individuals, their representatives and their workers to contact the awarded vendor or make other reasonable accommodations for clients out of the awarded vendors' local calling area. A representative of the awarded vendor should be available between the hours of 8:00 am and 4:30 pm PST Monday through Friday. When the representative is unavailable, the awarded vendor should maintain a voice messaging capacity.

GT has established a customer service center that can be reached at any time including evenings and holidays. GT will staff the customer service center to have live customer support from 8:00 to 4:30 PST.

2.8.3 Calls should be returned within one (1) working day from the time the message is recorded or letter of inquiry is received.

GT has mechanisms for tracking calls and responses. Customer Service staff have compensation incentives and other performance management tools in place to ensure compliance with this requirements.

2.8.4 Must operate a fax machine twenty-four (24) hours each day and have a secure internet/e-mail communication.

GT operates its own secure fax servers. Servers are up 24 hours per day and have multiple fail-over contingencies set up. Fax servers can handle a significant volume of transactions and have significant excess capacity.

2.8.5 Must be able to communicate effectively with individuals who have a variety of disabilities.

GT Independence takes pride in its role as an advocate for elderly and disabled people. The company mission, "To help people live a life of their choosing regardless of age or ability", is expressed in many ways, through our training and orientation process. Every GT employee receives training on Participant rights, cultural sensitivity, and working with people who have Limited English Proficiency.

GT Employees understand and value the opportunity to serve our customers and are equipped to communicate effectively with them.

2.8.6 Must demonstrate the ability to develop orientation and skill training programs for participants and/or their representative(s).

GT Independence has used Field Service Representatives to provide supportive services in participants' homes since the company's inception in 2004. GT's Field Reps fill various roles depending on program setup. Their duties range from simply doing in-home enrollment meetings to full support brokerage activities. Some things that GT Field Reps will do in this program:

- ***Provide in-home enrollments for new Participants and their employees***
- ***Support the hiring of new employees for Participants who are already up and running.***
- ***Provide skills training for Participants***
- ***Help Participants with the recruiting process.***
- ***Help Participants access training for their workers***
- ***Help Participants establish a budget and understand budget limits.***

GT has an extensive history in developing training and orientation materials. Recently, we have developed a full 2 month training program for participants in North Carolina's Innovations Waiver Program. The training includes extensive review of the role of the employer, documentation within the Innovations program, compliance requirements, management skills, recruiting tools and accessing community resources.

GT has also worked to develop program handbooks in other States and Programs. GT will customize a program handbook for this program and, once approved will distribute it to participants and help them understand it.

2.8.7 Any updates on tax and labor laws or other written reports or materials provided to individuals must be available in alternative format if requested (e.g., large print, use of telecommunication devices for the hearing and speech impaired). The awarded vendor must

have, at a minimum the capacity to access translation services and interpreter services when necessary.

GT has the ability to communicate in alternative formats including providing translations, large print or braille. GT has translation services available for non-English speakers. Please see Attachment P - 2-11 Communication Accommodations

2.8.8 Be culturally sensitive in all business practices in order to communicate effectively with a diverse population of individuals, and its policies and procedures must reflect the philosophy of self-direction.

GT is committed to being culturally sensitive. GT's policies, procedures, mission, vision and values all support Self-Determination. Attachment Q - 1-10 Cultural Competence and Limited English Proficiency

2.8.9 Communicate directly with the individual on some level, regardless of any particular disability the individual may have. In the event an individual chooses a representative to assist with budget management, the Division will notify the individual in a timely manner of the name of the individual's representative and other pertinent information.

GT commits to honoring the individuals wishes and communicating directly with the individual service recipient. GT has processes for identifying representatives. GT customer support staff receive privacy training to prevent them from disclosing protected health information to unauthorized parties including family members and workers.

2.8.10 Shall not disclose or otherwise inform family members, friends or other members of the individual's support network without prior written notification and approval from the individual/representative.

GT customer support staff receive privacy training to prevent them from disclosing protected health information to unauthorized parties including family members and workers.

2.8.11 Be willing to participate on ADSD-sponsored committees or work groups to maintain ongoing effectiveness, which includes billing and reporting, business practices, Workers Compensation, and recruitment and employment related topics.

GT Independence Field Service Representatives are charged with establishing and maintaining relationships with local agencies (Regional Centers) and the surrounding communities. GT staff will make themselves available to serve on committees, provide in-service trainings and collaborate in joint efforts to improve processes and raise awareness for self-direction.

2.8.12 Keep a registry of qualified employees who agree to be on the registry for referral to other individuals seeking employees in their geographic area of interest.

GT's Caregiver Link™ tool, which is available through the GT Portal is an online directory of qualified applicants that can be searched based on geographic data to assist in the recruiting process.

2.8.13 Develop policies and procedures that emphasize the application of the philosophy of participant directed services and being culturally sensitive in all business practices in order to communicate effectively with a diverse population of participants of all ages and with a variety of needs, disabilities and chronic conditions.

GT's mission is founded on the philosophy of participant directed services. We take pride in seeing that our values align with this mission and flow through all of our business operations. We also know that cultural sensitivity and communicating effectively with a diverse population is essential. We ensure all of our employees are trained on cultural competency and limited English proficiency upon hire and annually thereafter.

See Attachment R - 1-01 Mission and Core Values, Attachment Q - 1-10 Cultural Competence and Limited English Proficiency, and Attachment S - 4-21 Mandatory Training

2.8.14 Provide periodic information and training to families as changes occur in procedures, reporting or systems.

GT has a system that allows the company to provide periodic updates through different media including e-newsletters, mailed information and portal updates.

2.9 ADDITIONAL RESPONSIBILITIES

The awarded vendor will keep abreast of all laws and regulations relevant to the responsibilities it has undertaken with regard to the required Federal and State filings and the activities related to being a Fiscal Intermediary.

GT understands the importance of staying abreast of all relevant laws and regulations. For this reason, GT performs regular reviews of applicable laws and regulations to ensure any changes are reviewed and implemented. GT also holds a committee for review of all tax and legal forms to ensure that our packets are updated as necessary. See Attachment N - 6-03 Staying up to date with State and Federal Agencies.

2.10 AUDIT REQUIREMENTS

2.10.1 FMS' are subject to audit by the Aging and Disability Services Division, agents of the DHHS, and the State of Nevada's Auditors of Public Accounts. Records must be made available in Nevada for the audit.

GT is audited by state and regional entities on a regular basis and so we understand the importance of holding and making records available. We will ensure that records are promptly provided for any audits.

2.10.2 Vendors must submit a cost report in year one (1) of the contract, if requested by the ADSD.

GT is amenable to providing a cost report in the first year of the contract if requested by ADSD.

2.11 RECORDS

2.11.1 The FMS must maintain other such records and information required by ADSD including but not limited to:

2.11.1.1 Copies of phone logs;

GT uses a proprietary call logging system which tracks calls and our notes in relation to those calls. We are willing and able to provide these logs upon request.

See Attachment T - 6-22 Tracking Communication and Complaints

2.11.1.2 Summaries of complaints with resolution noted;

Our call logging system grants us the ability to track complaints along with their resolution status and accompanying notes. As such, GT will provide summaries of complaints with resolution information upon request.

2.11.1.3 Verification of individuals' payment of FICA, FUTA/SUTA; and

GT retains payment verification documentation for FICA, FUTA, and SUTA. IRS Forms 940, 941 (with schedules), and the applicable state form are retained on file. These forms provide filing confirmation by individual FEIN and will be available upon request. See Attachment J - 6-24 Processing Tax Filings

2.11.1.4 Federal (if requested) and State income tax and wages in compliance with Federal and State DOL rules and in the form and manner prescribed by state agency staff.

GT retains records of payment of wages and taxes in the formats required by Federal and State rules. These records will be made available as requested.

2.11.2 ADSD individuals and workers' records must be available for immediate review by the Aging and Disability Services Division or designated State agency. Records must be made available in Nevada within seven (7) days when requested by the ADSD.

All ADSD individual and worker records will be retained in a form such that they are accessible for immediate review by ADSD or designated state agency. Records will be provided in Nevada within 7 days if requested.

2.12 VETERAN DIRECTED HOME & COMMUNITY BASED SERVICES

The financial Management Services vendor must adhere to the following:

2.12.1 Pass a FMS Readiness Review conducted by the national technical assistance team at National Resource Center for Participant Directed Services.

GT Independence has successfully completed FMS readiness reviews multiple times.

GT Independence is committed to providing exceptional Financial Management Services to Medicaid and Veteran's programs and has successfully completed VF/EA readiness reviews within the past five (5) years. The following sworn statement from Kate Murray of Applied Self Direction provides confirmation of GT Independence's completion of a VF/EA Readiness Review and our qualifications to perform the scope of service functions outlined in the RFP.

"GT Independence passed an FMS readiness review to assess operational readiness to provide VF/EA FMS within the Veteran-Directed Home and Community Based Services Program. The readiness review was conducted by Mollie Murphy and Kate Murray on behalf of the National Resource Center for Participant-Directed Services, and GT Independence passed in August 2015. Mollie's contact information is: Mollie Murphy c/o Applied Self Direction, 210 Broadway, #201, Cambridge, MA 02139, (617) 953-3914."

2.12.2 Have a system in place to solicit annual feedback from Participants regarding FMS services performed on their behalf.

GT currently conducts semi-annual surveys in which it mails a physical copy of the survey to all participants. GT then collects the surveys and inputs them into a program that reports on the results of the surveys. The results have been very positive and reflect on GT's commitment to participant satisfaction. We will follow this same approach with Nevada.

2.12.3 Have a system for responding to complaints about FMS Participant services.

Continuous improvement is highly valued and deemed an essential element of GT's operations. Properly handling, tracking, and reporting on complaints is therefore

important to us. GT's call logging software allows for the notation, tracking, and escalation of complaints. It is our policy to resolve complaints well within the 5 day window; however, we will ensure that if a complaint is not resolved within 5 days that we will send a written receipt of the complaint. In such cases, GT will ensure that written resolution is provided no later than 30 days from the date of complaint receipt. We will ensure these requirements are met by providing tracking of the complaint receipt and resolution in our system, as well as, utilizing a complaint/grievance form.

Participants will be assisted with completing the complaint/grievance form when they desire to complete a written form. Trends in the receipt, completion, and resolution of complaints will be tracked using our software and reported quarterly as required.

2.13 END OF CONTRACT DELIVERABLES

Tasks to be completed by the vendor upon termination of the contract include, but are not limited to, the following:

2.13.1 File Nevada Department of Employment, Training and Rehabilitation (DETR) Form NUCS 4072, Employer's Quarterly Contribution Wage Report and pay all State unemployment insurance taxes due through the end of the contract period using the appropriate forms for each applicable program participant-employer and their workers, including zero filings. See NV Unemployment Compensation Program (DETR) Employer Handbook. https://uitax.nvdetr.org/crppdf/Employer_Handbook.pdf

Upon termination of the contract GT will perform all required duties. Termination of a contract would not cause any deviance from GT's standards of quality and integrity. GT would ensure that the DETR Form NUCS 4072 was filed in a timely manner and would pay all state unemployment insurance taxes through the end of the contract period. These filings would be completed on the necessary and proper forms.

2.13.2 File and pay all Federal income tax withholding due through the end of the contract reporting period. This would include the filing of the IRS Form 941, Employer's Quarterly Federal Tax Return, and the Schedule R, Allocation Schedule for Aggregate Form 941 Filers, and Schedule B (Form 941) as applicable, for the first two (2) tax quarters in the contract period for each applicable program participant-employer and their workers.

GT would file and pay Federal income tax withholding through the end of the contract reporting period. IRS Form 941, Schedule R, and Schedule B would be utilized as appropriate. This would be performed for the participants and their workers for the first 2 tax quarters in the contract period.

2.13.3 File and pay all Federal Social Security and Medicare taxes (FICA) due through the end of the contract period. This would include the filing of the IRS Form 941, Employer's Quarterly Federal Tax Return, and the Schedule R, Allocation Schedule for Aggregate Form 941 Filers,

and Schedule B (Form 941) as applicable, for the first two (2) quarters in the contract period for each applicable program participant-employer and their workers.

All FICA taxes due through the end of the contract period would be paid by GT. IRS Form 941, Schedule R, and Schedule B would be utilized as appropriate. This would be performed for the participants and their workers for the first 2 tax quarters in the contract period.

2.13.4 Issue IRS Forms W-2, Wage and Tax Statements to workers for the appropriate tax year.

GT would issue all W-2's for the participants' workers for the tax year as necessary.

2.13.5 Determine which program participant-employer and workers are eligible for a FICA refund for the period preceding the contract termination date.

GT would also ensure that all workers eligible for a FICA refund would be paid the refund as required.

2.13.6 Maintain all State unemployment insurance tax filings and payments and other relevant documents for the required period of time in each program participant's archived file.

All State unemployment insurance tax filings, payments, and other required documents will be kept in the participants archived file.

2.13.7 DETR requires that each employer keep true and accurate work records for each worker. The records must be kept for at least four (4) years and must show:

2.13.7.1 The beginning and ending date of each payroll period;

GT provides payroll schedules to all employers and maintains a copy for our records. GT also issues payroll according to these schedules and maintains a copy of all payments. These pay stubs also indicate the beginning and end date of each pay period.

2.13.7.2 The total wages payable for the payroll period and the date paid;

The pay stubs retained in GT's records for each payment made to a participant's employees indicate the total wages payable and the date paid. These are available upon request.

2.13.7.3 The date the worker was hired;

GT maintains the date that the participant's worker was hired as part of the employee's personnel file.

2.13.7.4 The date the worker was separated from employment;

GT maintains a status change form in worker files to indicate separation from employment and will ensure that the files contain this form.

2.13.7.5 The dates the employee worked; and

GT will maintain dates that each employee worked through timesheets included as a part of the employee's personnel file.

2.13.7.6 The State or States in which the services were performed.

Each employee personnel file will indicate the State or States in which services were performed.

Separate entries must be made to record money wages, the cash value of other remuneration, and special payments such as bonuses, prizes, or gifts (DETR Employer Handbook, p. 29).

GT will maintain records of all payments made to participants' employees. These payments will contain separate entries for wages and any other type of remuneration such as bonuses, gifts, prizes, etc.

2.13.8 Maintain all Federal tax filings, payments, and other relevant documents for the required time period in each program participant-employer's archived file.

All archived files will contain documents indicating Federal tax filings, payments, and other relevant documents for the required time period.

IRS requires that all employment tax records be kept at least four (4) years after the date that the tax becomes due or is paid, whichever is later. The records should be kept longer if they are the subject of an IRS review (IRS website).

All tax records will be kept for over 4 years. It is GT's policy to hold records for 10 years.

See Attachment B - 6-05 Record Management

Once all required Federal and State filings, payments and reporting are completed by the vendor(s), the vendor(s) must perform the following tasks:

2.13.8.1 Revoke the IRS Form 2678, Employer/Payer Appointment of Agent with each applicable program participant-employer.

Once the essential Federal and State filings are completed and any payments or reports have been sent then GT will ensure that the IRS Form 2678 is revoked. This form will be revoked for each participant. See* Attachment F *- 6-18 Consumer Termination.

2.13.8.2 Receive the IRS Notice of Agent Revocation for each program participant-employer for which it revokes an IRS Form 2678.

The IRS Notice of Agent Revocation which is provided after the 2678 is revoked will be received and filed for each participant.

2.13.8.3 Maintain copies of revoked IRS Form 2678, Employer/Payer Appointment of Agent, and the IRS Notice of Agent Revocation and related documentation in each program participant-employer's archived file for the required time period.

GT will ensure that it retains the IRS Form 2678, the associated revocation document, and any related documents in the archived participant files.

2.13.8.4 Revoke the IRS Form 8821, Tax Information Authorization.

Once the essential Federal and State filings are completed and any payments or reports have been sent then GT will ensure that the IRS Form 8821 is revoked. This form will be revoked for each participant.

2.13.8.5 Maintain copies of revoked IRS Form 8821, Tax Information Authorization and related documentation in each program participant-employer's archived file for the required time period.

GT will ensure that it retains the IRS Form 8821 and any related documents in the archived participant files.

2.13.8.6 Retire the program participant-employer's Federal employer identification number with the IRS.

While the IRS has indicated that they will not disassociate an FEIN from the participant they will close their business account. As such, GT will ensure that the business account for the FEIN's is closed for each participant.

2.13.8.7 Maintain copies of the FEIN retirement letter to the IRS and any other related correspondence in each program participant- employer's archived file for the required time period.

GT will keep a copy of the letter they send to the IRS to close the business account for the FEIN in the participant's file.

2.13.8.8 Revoke the program participant-employer's DETR Power of Attorney (Form NUCS 4556). Vendor should consult the DETR Employer Handbook and contact ADSD to determine how this should be done.

GT will ensure that the DETR Power of Attorney form is revoked for each participant.

Note: Nevada Unemployment Compensation Law prohibits disclosure of employer information to any other person or the general public. Therefore, in order to discuss a business with a designated agent (or for your agent to be able to access your online account), ADSD must have on file a current and complete Power of Attorney (Form NUCS 4556) or an approved substitute form.

2.13.8.9 Maintain copies of the revocation of the state unemployment compensation Power of Attorney (Form NUCS 4556) in each program participant-employer's archived file for the required time period.

GT will maintain copies of the revocation of the Form NUCS 4556 in each of the participants' archived files.

2.13.8.10 Retire the program participant-employer's NV DETR employer account number for State unemployment insurance tax purposes per DETR requirements. Vendor(s) should consult the DETR Employer Handbook and contact ADSD to discuss how this should be done.

GT will ensure that the participant-employer's NV DETR account number for unemployment insurance tax purposes is retired and will ensure that the processes as outlined in the handbook and by ADSD are followed.

2.13.8.11 Maintain copies of the documentation related to retiring the program participant-employer's NV DETR employer account number in the person's archived file for the required time period.

GT will ensure that copies of the documentation related to retiring the NV DETR employer account number are maintained in the archived file for the required period.

2.13.8.12 Vendor is responsible for responding to any inquiries raised by IRS or NV DETR related to the tax years the vendor acts as the employer agent for program participant-employers enrolled in the State Funded Self-Directed services program and anyone who used the vendor as the FMS agent. This time period probably will cover four (4) years after the date all Federal and State taxes were filed and paid.

GT will respond to any inquiries from the IRS or NV DETR in regards to any filings in which GT performed functions as the employer agent for the required period.

2.13.8.13 Assist with the transition process as applicable, to include:

A. Transfer of all records and files to new FMS in a timely manner;
GT would act in a cordial and cooperative fashion during any transfers to a new FMS provider. Any records would be provided in a timely manner.

B. Communication with the new FMS to assure timely services with service recipients; and
GT would ensure that it maintained open communication with a new FMS during a transfer to ensure the process went smoothly.

C. Notification to service recipients regarding FMS changes, to include information regarding pertinent and applicable changes and contact information.

D. ***GT would conduct proper notices to service recipients during a transition so that the participants would have the necessary contact information and be knowledgeable in regards to the changes.***

Section VI– Company Background and References

VENDOR INFORMATION

Vendors shall provide a company profile in the table format below.

Question	Response
Company name:	Guardiantrac, LLC d/b/a GT Independence
Ownership (sole proprietor, partnership, etc.):	Limited Liability Company
State of incorporation:	Michigan
Date of incorporation:	01/01/2004
# of years in business:	13
List of top officers:	John Carmichael, Bonnie Carmichael, Dan Carmichael, Holly Carmichael, Mike Miller
Location of company headquarters, to include City and State:	215 Broadus St., Sturgis, MI 49091
Location(s) of the office that shall provide the services described in this RFP:	215 Broadus St., Sturgis, MI 49091
Number of employees locally with the expertise to support the requirements identified in this RFP:	TBD
Number of employees nationally with the expertise to support the requirements in this RFP:	210
Location(s) from which employees shall be assigned for this project:	TBD

A Nevada-based business may apply for a five percent (5%) preference on its proposal. This preference may apply if a business has its principal place of business within Nevada. This preference cannot be combined with any other preference, granted for the award of a contract using federal funds, or granted for the award of a contract procured on a multi-state basis. To claim this preference a business must submit a letter with its proposal showing that it qualifies for the preference.

Please be advised, pursuant to NRS 80.010, a corporation organized pursuant to the laws of another state shall register with the State of Nevada, Secretary of State's Office as a foreign corporation before a contract

can be executed between the State of Nevada and the awarded vendor, unless specifically exempted by NRS 80.015.

The selected vendor, prior to doing business in the State of Nevada, shall be appropriately licensed by the State of Nevada, Secretary of State's Office pursuant to NRS76. Information regarding the Nevada Business License can be located at http://nvsos.gov.

Question	Response
Nevada Business License Number:	TBD
Legal Entity Name:	

Is "Legal Entity Name" the same name as vendor is doing business as?

Yes		No	X

If "No", provide explanation. Guardiantrac, LLC d/b/a GT Independence

Has the vendor ever been engaged under contract by any State of Nevada agency?

Yes		No	X

If "Yes", complete the following table for each State agency for whom the work was performed. Table can be duplicated for each contract being identified.

Question	Response
Name of State agency:	
State agency contact name:	
Dates when services were performed:	
Type of duties performed:	
Total dollar value of the contract:	

Are you now or have you been within the last two (2) years an employee of the State of Nevada, or any of its agencies, departments, or divisions?

Yes		No	X

If "Yes", please explain when the employee is planning to render services, while on annual leave, compensatory time, or on their own time?

If you employ (a) any person who is a current employee of an agency of the State of Nevada, or (b) any person who has been an employee of an agency of the State of Nevada within the past two (2) years, and if such person shall be performing or producing the services which you shall be contracted to provide under this contract, you shall disclose the identity of each such person in your response to this RFP, and specify the services that each person shall be expected to perform.

Disclosure of any significant prior or ongoing contract failures, contract breaches, civil or criminal litigation in which the vendor has been alleged to be liable or held liable in a matter involving a contract with the State of Nevada or any other governmental entity. Any pending claim or litigation occurring within the past six (6) years which may adversely affect the vendor's ability to perform or fulfill its obligations if a contract is awarded as a result of this RFP shall also be disclosed.

Does any of the above apply to your company?

Yes		No	X

If "Yes", please provide the following information. Table can be duplicated for each issue being identified.

Question	Response	
Date of alleged contract failure or breach:		
Parties involved:		
Description of the contract failure, contract breach, or litigation, including the products or services involved:		
Amount in controversy:		
Resolution or current status of the dispute:		
If the matter has resulted in a court case:	Court	Case Number
Status of the litigation:		

Vendors shall review and provide if awarded a contract the insurance requirements as specified in ***Attachment D, Insurance Schedule for RFP 3459***

GT maintains a full portfolio of insurance coverage and will ensure that Attachment D's requirements are met prior to conducting business in Nevada.

Company background/history and why vendor is qualified to provide the services described in this RFP. Limit response to no more than five (5) pages.

Company History

GT Independence came to be through the Carmichael family's efforts to advocate for their family member Ben Carmichael. Ben was born with a condition that would result in a lifelong developmental disability. Through his 42 years, Ben has experienced first-hand the transformation of the public health care system for disabled people. The company, like the family, has values firmly rooted in the idea of Self-Determination for all. GT Independence strives for integrity, professionalism, community, respect and excellence in its approach to financial management and supports broker services.

Bonnie Carmichael, Principal and Founder of GT Independence embodies the company's core principles. As a young accountant at Peat Marwick in Detroit, Bonnie challenged the norms of a male dominated professional culture and succeeded as one of the only female accountants at the company. The arrival of her son, Ben would set her on a new path to change our culture. Before the term Self-Determination was used to describe services for people like Ben, Bonnie was fighting so Ben could have a life that was worth living. She was determined that Ben would not be simply warehoused and left to languish in the institution. She challenged the system and helped Ben get the life he wanted. Then she used her experience and her business skills to help thousands of others like Ben to have a life worth living as well. As the company continues to expand and deliver on its mission to help people live a life of their choosing regardless of age or ability, Bonnie remains the driving force behind GT's culture.

Prior Experience

GT Independence provides Vendor Fiscal/Employer Agent, Agency with Choice and Supports Brokerage Services. The company began operations in Michigan where it contracted with small, county level Community Mental Health Services Programs (CMHSP's) to deliver F/EA services. GT's hands on approach changed the way self-direction was viewed in Michigan. By incorporating supports brokers to conduct face-to-face enrollment, orientation and training

functions, GT removed the significant barriers to participation in Michigan's self-direction program.

The company expanded its services to the frail elderly in Michigan through the MI Choice Waiver program in Michigan in 2006. From 2006 forward, GT expanded to new states with different delivery models. The company maintains a focus on hands on service and stakeholder satisfaction. Today the company serves participants in 9 States and operates within State fee-for-service models, PIHP and MLTSS programs. The company works with several large health plans including Humana, Aetna and Molina.

Since 2004 when the company was founded, GT has helped 20,000 Medicaid beneficiaries direct their own home and community based care. All of those participants received enrollment services and an in-home orientation meeting from a GT Independence supports broker. Last month the company conducted 459 in home orientations. Our average customer satisfaction rate is 98%.

Building a Culture of Self-Determination through Training

Over the past five years the company has grown at an average rate of 30.4%. The company's managers have consistently invested in our most important asset – our people. GT has made numerous investments in training and developing our staff including:

- ***Targeted Selection training for managers and leads so we can find team members who will share our passion for self-determination***
- ***Comprehensive orientation and skills training for new team members***
- ***Dedicated training coordinator and brand new training facilities***
- ***Leadership development program and leadership training courses taught by GT executive team members***
- ***Continuous technical training though GT's Compliance and Quality Assurance Department***
- ***Professional development and continuing education***

The company's workforce investment has become a real strength. Investments have yielded reduced turnover, longer employee tenure and higher job satisfaction which means a better experience for the people we serve.

Certifications

GT complies with all licensure requirements for delivering FMS. The company employs an in-house attorney and multiple Certified Public Accountants who maintain their licensure and participate in required continuous education.

The company has acquired two EINs for performance of FMS services as promulgated under IRS revenue procedure 70-6. The company complies with State, Local and Federal licensure/registration guidelines.

In November 2012 GT Independence became CARF accredited. CARF is an independent, nonprofit accrediting body whose mission is to promote the quality, value, and optimal outcomes of services delivered by companies like GT Independence. GT Independence has been awarded a Three-Year Accreditation for all services. This accreditation decision represents the highest level of accreditation that can be awarded to an organization and shows the organization's substantial conformance and commitment to the CARF standards. In 2015 the company's CARF accreditation was renewed for another 3-year period.

GT Independence is a member in good standing of Applied Self-Direction (ASD), formerly the National Resource Center for Participant Directed Services (NRCPDS), and a regular participant in conferences and webinars supported by ASD. GT executives have served on various committees with ASD.

Recently, GT CEO John Carmichael chaired a subcommittee of ASD's Advancing Self-Direction Committee to look at the impact of proposed Medicaid Reform on people with disabilities and long term care needs.

Resources

The company relies on key resources to achieve excellent outcomes in delivery of Financial Management and Supports Broker Services.

Experienced Management Team – GT's executive team combines dozens of years of experience working with State HCBS programs. The team holds a comprehensive understanding of State and Federal policies that impact self-directed services: employment law considerations, trends in long term supports and services, best practices in health care privacy, prevention of fraud, waste and abuse, performance management and internal controls. The team approaches management from a diverse set of disciplines including social services, business, finance and law.

Technology – GT has invested in technology to spur operational efficiency and provide real-time support for stakeholders. Our web portal allows users to see real time budget information, download program documents and forms, and submit timesheets and service documentation. The Caregiver Link™ tool provides access to pre-screened workers for employers or potential employers who are recruiting. Our information technology is maintained by in-house development and infrastructure support staff who have built the system from the ground up, giving GT the agility to quickly adapt to the changing

environment. For example, the company has recently developed upgrades to our portal that make it fully compliant with EVV requirements in the 21st Century cures act.

Extensive Supports Brokerage Know-How – The Company has made supports brokerage the key feature of its service delivery model. Programs define supports brokerage along a wide spectrum of training, enrollment and technical assistance services. Whatever the parameters for a program's support brokerage function it is clear that self-directed arrangements do best when there is strong support at the point of enrollment and orientation to the program as well as good follow through with participants as they manage their arrangements. Our company has enrolled every single participant we have ever served through a company supports broker. We have arrangements where the broker plays an important role for a few weeks or a few months and even indefinitely. Our experience and diverse understanding of the role helps us deliver great supports brokerage service.

Program and Quality Management Systems

GT Independence manages company performance and compliance with contracts through an array of tools, processes and metrics.

The company focuses on document integrity through internal file audits conducted by members of the compliance and quality assurance team. We also regularly query our information system with a series of data integrity reports designed to find missing or incomplete data. The data integrity committee identifies opportunities to find and correct problems that lead to inaccurate data.

Managers review metrics that measure the quality of the customer experience. Metrics like call center hold time, average time to close customer service requests and payroll error rates inform management's training and hiring strategies.

All major company functions including but not limited to supports brokerage services, payroll services, tax services, reporting and worker eligibility are documented in a policy, procedure and internal control.

Provide a brief description of the length of time vendor has been providing services described in this RFP to the public and/or private sector.

GT has been providing FMS services for over 13 years.

Financial information and documentation to be included in accordance with ***Section 8.5, Part III – Confidential Financial Information***.

Dun and Bradstreet Number
196205483
Federal Tax Identification Number
32-0112072
The last two (2) years and current year interim:

Profit and Loss Statement
See attached
Balance Statement
See attached

SUBCONTRACTOR INFORMATION

Subcontractors are defined as a third party, not directly employed by the contractor, who shall provide services identified in this RFP. This does not include third parties who provide support or incidental services to the contractor.

Does this proposal include the use of subcontractors?

Yes		No	X

If "Yes", vendor shall:

Identify specific subcontractors and the specific requirements of this RFP for which each proposed subcontractor shall perform services.

If any tasks are to be completed by subcontractor(s), vendors shall:

Describe how the work of any subcontractor(s) shall be supervised, channels of communication shall be maintained and compliance with contract terms assured; and

Describe your previous experience with subcontractor(s).

Provide the same information for any proposed subcontractors as requested in ***Section 3.1, Vendor Information***.

Vendor shall not allow any subcontractor to commence work until all insurance required of the subcontractor is provided to the vendor.

Vendor shall notify the using agency of the intended use of any subcontractors not identified within their original proposal and provide the information originally requested in the RFP in ***Section 3.2, Subcontractor Information***. The vendor shall receive agency approval prior to subcontractor commencing work.

BUSINESS REFERENCES

Vendors shall provide a minimum of three (3) business references from similar projects performed for private and/or public sector clients within the last three (3) years.

The requested references have been submitted to the provided email address.

Vendors shall submit ***Attachment E, Reference Questionnaire*** to their business references.

The requested questionnaires have been submitted to the provided email address.

It is the vendor's responsibility to ensure that completed forms are received by the Purchasing Division on or before the deadline as specified in ***Section 7, RFP Timeline*** for inclusion in the evaluation process. Reference Questionnaires not received, or not complete, may adversely affect the vendor's score in the evaluation process.

The State reserves the right to contact and verify any and all references listed regarding the quality and degree of satisfaction for such performance.

VENDOR STAFF RESUMES

A resume shall be completed for each proposed key personnel responsible for performance under any contract resulting from this RFP per ***Attachment F, Proposed Staff Resume.***
See attached

Section VII – Attachment F – Proposed Staff Resume

A. Vendors shall include all proposed staff resumes per Section 3.4, Vendor Staff Resumes in this section.

See attached

B. This section shall also include any subcontractor proposed staff resumes, if applicable.

N/A

PROPOSED STAFF RESUME FOR RFP 3459

A resume must be completed for all proposed prime contractor staff and proposed subcontractor staff.

Company Name Submitting Proposal:	***GT Independence***

Check the appropriate box if the proposed individual is prime contractor staff or subcontractor staff.			
Contractor:	***X***	**Subcontractor:**	

The following information requested pertains to the individual being proposed for this project.			
Name:	***Holly Carmichael***	**Key Personnel: (Yes/No)**	***Yes***
Individual's Title	***Chief Operating Officer***		
# of Years in Classification:	***2.5***	**# of Years with Firm:**	***11***

BRIEF SUMMARY OF PROFESSIONAL EXPERIENCE

Information should include a brief summary of the proposed individual's professional experience.

Holly Carmichael is the COO of GT Independence and is responsible for the Operations of all Financial Management Services including Payroll and Customer Service. Holly has been working at GT Independence since 2006 and has been able to effectively improve both service delivery and customer satisfaction. Her dedication to person-centered services goes unmatched as she knows first-hand how important self-direction and choice is to individuals in need of long term care.

Holly has years of experience in the human service field beginning in group homes as a direct care staff. After learning how important self-determination was to the lives of individuals with disabilities she began working at GT Independence. Holly Carmichael began her career as a direct service provider working in a group home of adult men. While attending school at Western Michigan University and graduating Magna Cum Laude, Holly worked her way up the career ladder to her position today. With her experience job coaching Holly saw a void in St. Joseph County, MI and started the Supported Employment division of GT Independence's Michigan Agency with Choice. This was founded on the basic principle that every individual should have the opportunity and choice to seek employment if desired; every individual adds value to their community and is needed. While Director of Michigan Agency with Choice, Holly was recognized by Community Mental Health of St. Joseph County for her coordination of services with elderly clients. She remains highly regarded amongst Community Mental Health staff.

A passionate and driven leader, Holly has been able to demonstrate the ability to provide high quality services while expanding and growing service operations. Her conviction to self-determination remains throughout as she continues to advocate for each client served to lead their own life on a daily basis.

RELEVANT EXPERIENCE

Information required should include: timeframe, company name, company location, position title held during the term of the contract/project and details of contract/project.

06/06 – Present ***GT Independence, Financial Management Services, Sturgis, MI***

Chief Operating Officer (02/16-Present)
Director of Customer Relations (06/10-02/16)

- Collaborate and develop company's strategy, vision, and goals
- Develop budget forecast and monitor resource needs based on growth
- Responsible for all operations including Customer Service, Payroll, Processing, and IT
- Member of Business Development Team, Quality Management Team, and CARF Committee
- Effectively coordinate with agency representatives and work collaboratively within a multi-disciplinary

team

- Handle escalated issues including investigating, troubleshooting, and developing long-term solutions
- Develop effective policies, procedures, and workflows
- Develop and coach management team to effectively supervise 100+ front line employees
- Improved Customer Satisfaction by 5% over two years
- Developed Operational Standards and regular metrics to monitor and improve performance

11/11 – 12/13 ***GT Independence, Blue Skies Adult Day Center, Sturgis, MI***

Director

- Developed effective adult day services program including policies and procedures
- Assessed clientele in multiple areas including activities of daily living and psychosocial functioning
- Organized appropriate community activities for individuals and linked with community resources
- Developed marketing materials and a marketing plan
- Marketed services in the community including presentations and radio interviews
- Negotiated contracts and completed grant proposals
- Prepared billing to multiple agencies as well as private pay individuals

06/10 – 12/13 ***GT Independence, Michigan Agency with Choice, Sturgis, MI***

Director

- Managed files for 200+ clients and 30+ employees
- Scheduled needed services and linked clients with community resources
- Organized community activities for groups of individuals
- Worked collaboratively with a multi-disciplinary team
- Improved compliance audit results by 15% over the course of the first year
- Lead committee member to acquire CARF Accreditation for direct services provided

EDUCATION

Information required should include: institution name, city, state, degree and/or Achievement and date completed/received.

Western Michigan University
Kalamazoo, MI
Bachelor of Social Work, Magna Cum Laude
June 2011

Kalamazoo Valley Community College
Kalamazoo, MI
Associate of Arts with Honors
December 2008

CERTIFICATIONS

Information required should include: type of certification and date completed/received.

Holly has completed multiple continuing education courses and applicable conferences as well as held committee membership positions.

- March 2011, Working with People Certification from The Center for Positive Living Supports
- July 2011, Michigan Adult Day Services Association Retreat on Supportive Environment and Program Design, Educating Caregivers, and more.
- 2013, Member of Veteran Community Partnership SW Michigan Leadership Committee
- May 2015, National Resource for Participant Directed Services Conference Attendee
- January 2016, Self-Determination Leadership Seminar Attendee
- November 2016, MI Health Link Provider Summit Attendee
- May 2017, Applied Self Direction Conference Attendee
- August 2017, National Home and Community Based Services Conference Attendee

REFERENCES

A minimum of three (3) references are required, including name, title, organization, phone number, fax number and email address.

Donna Thompson, RN
Case Manager Supervisor
Cape Fear Valley Health System
Phone: 910-484-4297, Extension 33
Fax: 910-615-1730
dthom@capefearvalley.com

Lisa Ballien
Director of Community Support
CLS Oakland
Phone: 248-547-2668
Fax: 248-547-3052
lballien@comlivserv.com

Laura Sutter
Director
Area Agency on Aging Region 3C
Phone: 517-278-2538
Fax: 517-278-2923
sutterl@bhsj.org

PROPOSED STAFF RESUME FOR RFP 3459

A resume must be completed for all proposed prime contractor staff and proposed subcontractor staff.

Company Name Submitting Proposal:	***GT Independence***

Check the appropriate box if the proposed individual is prime contractor staff or subcontractor staff.			
Contractor:	***X***	**Subcontractor:**	

The following information requested pertains to the individual being proposed for this project.			
Name:	***Rob Lewis***	**Key Personnel: (Yes/No)**	***Yes***
Individual's Title	***Director of Business Development***		
# of Years in Classification:	***6 Years***	**# of Years with Firm:**	***8***

BRIEF SUMMARY OF PROFESSIONAL EXPERIENCE

Information should include a brief summary of the proposed individual's professional experience.

Rob is responsible for developing new business opportunities and building strong relationships with existing stakeholders. Rob has been instrumental in developing and training GT's 40 plus field service representatives throughout the country. Rob holds a BS in Marketing and Logistics from Central Michigan University.

RELEVANT EXPERIENCE

Information required should include: timeframe, company name, company location, position title held during the term of the contract/project and details of contract/project.

Over the course of my six (6) years as Director of Business Development I have been involved in multiple transitions from other FMS providers or statewide expansion from an agency. Three of the projects are detailed out below:

In January of 2013, Community Care, Inc reduced the amount of FMS providers from six (6) to two (2) and was and still are the preferred FMS provider. In four (4) months time GT Independence was tasked to transition approximately 1,000 participants from the prior FMS organizations. As the Director of Business Development, we were able to do this efficiently with the use of our Field Service Representative's and meeting with all Participants and their Employee's in a face to face manner.

In August 2015, the State of Maine chose GT Independence as one of two FMS providers for their entire state. Prior to selecting two (2) FMS the State of Maine was using a total of five (5) FMS providers. In two (2) months time GT Independence was tasked to transition approximately 350 participants from the prior FMS organizations. As the Director of Business Development, we were able to do this efficiently with the use of our Field Service Representative's and meeting with all Participants and their Employee's in a face to face manner. Over the last two years we have been able to double the amount of Participant that Self Direct their own service with GT Independence.

In January 2016, Humana informed GT Independence that they would be expanding their Florida services statewide (from three major counties) in March of 2016. As the Director of Business Development we needed to recruit, hire, and train additional Field Service Representative's along with State Services Director. GT Independence was able to hire three (3) additional Field Service Representative's and promote an employee to State Services Director. Over the course of the next year GT Independence was able to help triple the number of individuals that were Self-Directing their own care.

EDUCATION

Information required should include: institution name, city, state, degree and/or Achievement and date completed/received.

Central Michigan University
Mt. Pleasant, Michigan
BS in Marketing and Logistics completed December 2003

CERTIFICATIONS

Information required should include: type of certification and date completed/received.

N/A

REFERENCES

A minimum of three (3) references are required, including name, title, organization, phone number, fax number and email address.

Ed Miller
Director of Provider Relations
Humana Health Plan Florida
Phone – (305)804-8394
Fax – (305)370-6126
emiller13@humana.com

Jenny Dock
Accounting Manager
Denver Regional Council of Governments
Phone – (720)635-5733
Fax – (303)480-6790
jdock@drcog.org

Barbara Wollner
Family Care Manager
Community Care, Inc.
Phone – (262)953-8520
Fax – (414)385-6612
barbara.wollner@communitycareinc.org

PROPOSED STAFF RESUME FOR RFP 3459

A resume must be completed for all proposed prime contractor staff and proposed subcontractor staff.

Company Name Submitting Proposal:	***GT Independence***

Check the appropriate box if the proposed individual is prime contractor staff or subcontractor staff.			
Contractor:		**Subcontractor:**	

The following information requested pertains to the individual being proposed for this project.			
Name:	***Megan Stringham***	**Key Personnel: (Yes/No)**	
Individual's Title	***Operations Manager***		
# of Years in Classification:	***1.5***	**# of Years with Firm:**	***6***

BRIEF SUMMARY OF PROFESSIONAL EXPERIENCE

Information should include a brief summary of the proposed individual's professional experience.

Supervise all Operations Staff for Michigan, ensure all deadlines are met, complete business development for newly acquired contracts, monitor workload of staff to ensure a proper distribution of tasks, prepare reports, monitor weekly metrics, create and maintain operational objectives, and build relationships with agency personnel to ensure satisfaction. Deescalate upset Customers, promote intradepartmental collaboration, interview all interested applicants, properly discipline staff in accordance with company policy, and coach/mentor Operations Staff.

RELEVANT EXPERIENCE

Information required should include: timeframe, company name, company location, position title held during the term of the contract/project and details of contract/project.

I have 6 years of experience at GT Independence in Sturgis, Michigan working in many different facets of the industry. I have moved from Quality and Compliance to Customer Relations, Customer Service and now to Operations Manager. I oversee all Operations to ensure deadlines are met, we have proper staffing, guidelines are followed and ultimately that we have a satisfied Customer.

EDUCATION

Information required should include: institution name, city, state, degree and/or Achievement and date completed/received.

University of Michigan, Ann Arbor, MI, Bachelor of Arts in Psychology, 4/13/2009

CERTIFICATIONS

Information required should include: type of certification and date completed/received.

Insert here any certifications proposed individual has received.

REFERENCES

A minimum of three (3) references are required, including name, title, organization, phone number, fax number and email address.

Tami Smith, Director, Thurston Cares Adult Day Center, phone 269-503-7800, fax 269-503-7801, tsmith@thurstonwoods.org

Emily Betz, Director of Programs and Services, The Right Door for Hope, Recovery and Wellness, phone 616-527-1790, fax 616-527-0538, ebetz@rightdoor.org

Lucia Morrison, Network and Quality Management Coordinator, Community Living Services of Oakland County, phone 548-547-2668, fax 248-547-3052, Lmorriso@comlivserv.com

Section VIII – Other Informational Material

GT Independence submits the following attachments which are referenced in the Technical Proposal.

GT Independence Policy Manual
Table of Contents

The below mentioned Policies apply to all GT Independence locations

Chapter 1 - General Policies

Subject	01	Mission and Core Values
Subject	01A	GT Branding Guidelines
Subject	01B	MAwC Branding Guidelines
Subject	01C	GT Independence Organization Chart
Subject	02	Administration and Policy Development
Subject	03	Ethical Standards
Subject	04	Recipient Rights
Subject	05	Confidentiality
Subject	05A	Confidentiality Employee Acknowledgement
Subject	06	HIPAA Policy
Subject	06A	Privacy, Grievance and Sign Off
Subject	06B	HIPPA Training
Subject	07	HIPAA Privacy Reporting of Data Breaches
Subject	07A	Breach Reporting Log
Subject	08	Ethical Promotion of Services
Subject	09	Corporate Compliance Plan
Subject	09A	Quality Management Team Charge
Subject	10	Cultural Competence and Limited English Proficiency
Subject	10A	Cultural Diversity Committee Charge
Subject	11	Consumer Grievances
Subject	11A	Consumer Grievances Form
Subject	11B	Grievance Notification
Subject	12	Preventing Exploitation
Subject	13	Fraud Prevention Program
Subject	13A	False Claims & Whistleblowers Training
Subject	13B	False Claims Quiz & Acknowledgement
Subject	13C	Incident Report
Subject	14	Conflict of Interest
Subject	15	Entry Criteria, Waiting List, and Exit Criteria
Subject	16	Medication
Subject	17	Web Portal
Subject	17A	Web Portal Terms of Use

Chapter 2 - Operations

Subject	01	Privacy and Security Controls
Subject	02	Communication and Equipment
Subject	03	Prohibited Items and Activities
Subject	04	Mileage Reimbursement

Subject	05	Petty Cash
Subject	06	Supplies Purchasing
Subject	07	Fax Security and Privacy
Subject	08	Disaster Recovery Plan for Computerized Records
Subject	09	Subpoena and Search Warrants
Subject	10	Document Retention and Disposal
Subject	11	Communication Accommodations
Subject	11A	Interpretation Waiver
Subject	11B	Michigan Relay
Subject	11C	North Carolina Relay
Subject	11D	Wisconsin Relay
Subject	11F	Florida Relay
Subject	11G	Colorado Relay
Subject	11H	Maine Relay
Subject	12	Printing
Subject	13	IT Security Incident Response Plan
Subject	13A	IT Security Incident Report
Subject	14	Social Media Relations
Subject	15	Segregation of Duties
Subject	16	Approval of Financial Transactions
Subject	17	Monthly Closing of Financial Statements
Subject	18	Purchase for Client Policy
Subject	18A	Purchase of Client Form
Subject	19	Purchase of Card Policy
Subject	19A	Purchase of Card Request Form
Subject	20	Expense Report Policy
Subject	20A	Expense Report
Subject	21	Policy Acknowledgement and Signature Form
Subject	22	Internal Purchasing Requisition Policy
Subject	22A	Internal Purchasing Requisition Form

Chapter 3 - Health and Safety

Subject	01	Health and Safety
Subject	02	Safety Committee Plan
Subject	03	Community Emergency Preparedness
Subject	06	Evacuation
Subject	06A	Emergency Drill Evaluation
Subject	07	Tornado and Severe Thunderstorm
Subject	08	Earthquake
Subject	09	Severe Winter Weather
Subject	10	Medical Emergencies
Subject	11	Hazard Communication
Subject	12	Exposure Control Plan

Subject	12A	HEP B Employee Letter
Subject	12B	HEP B Form
Subject	12C	Sharps Injury Log
Subject	13	Terrorist Hazards
Subject	14	Gas Leaks
Subject	15	Flood
Subject	16	Inspections
Subject	16A	Building Inspection Form
Subject	17	Emergency Power and Power Outages
Subject	18	Electrical Safety
Subject	19	Utilities Management
Subject	20	Snow and Ice Removal
Subject	21	Incident Reporting
Subject	21A	Incident-2015
Subject	22	Persons Served
Subject	23	Health and Safety Training
Subject	24	Vehicle Safety
Subject	24A	Vehicle Safety Training
Subject	24B	Vehicle Safety Training Quiz
Subject	24C	Pre-Trip Inspection
Subject	24D	Quarterly Company Van Inspection
Subject	24E	Company Van Emergency Kit Checklist
Subject	24F	Accident Report Form
Subject	24G	Personal Vehicle Inspection
Subject	24H	Vehicle Maintenance Log
Subject	24I	Portable First Aid Checklist
Subject	25	Workplace Violence

Chapter 4 - Hiring and Management

Subject	01	Hiring and Management
Subject	02	Employment Arrangements
Subject	03	Orientation
Subject	04	Personnel File and Records
Subject	04A	Transfer Checklist
Subject	04B	New Hire Orientation Checklist
Subject	04C	Termination Checklist
Subject	05	Leaves of Absence
Subject	06	Paid Time Off
Subject	07	Holidays
Subject	08	Job Transfers and Promotions
Subject	09	Personnel Evaluations
Subject	10	Criminal Charges
Subject	11	Resignation and Termination
Subject	12	Request to be Excused From an Aspect of Care or Service

Subject	13	Organization Chart and Job Descriptions
Subject	14	Alcohol, Illegal Drugs, and Testing
Subject	15	Supplemental Employment
Subject	16	Employee Conduct
Subject	17	Employer Property and Searches
Subject	18	Dress Code and Personal Appearance
Subject	19	Insurance and Risk Management
Subject	20	Students and Volunteers
Subject	21	Mandatory Training
Subject	21A	Training and Orientation Procedures
Subject	22	Overtime
Subject	23	Hours of Work
Subject	24	Assuring Work Eligibility
Subject	25	Absence and Tardiness
Subject	26	Sexual Harassment
Subject	27	Problem Solving Disputes
Subject	28	Smoking and Use of Tobacco Products
Subject	29	Workers Compensation Claims
Subject	30	Operation of Company Owned Vehicles and Machinery
Subject	31	Criminal Background Checks
Subject	31A	HR Employment Application
Subject	31B	Criminal Record Check Consent Form
Subject	32	Equal Employment Opportunity and Affirmative Action Plan
Subject	33	Employee Referral for Employment
Subject	34	Tuition Reimbursement Policy
Subject	35	Telecommuting Policy
Subject	35A	Volunteer Form
Subject	36	Nondiscrimination Statement

Chapter 5 - Michigan Agency with Choice Specific Policies

Subject	01	Human Rights Board By-Laws
Subject	01A	MAWC Organization Chart
Subject	03	Blue Skies Service Plan
Subject	04	Medication
Subject	04A	Medication Administration Training
Subject	04B	Medication Administration Test
Subject	04C	Medication Administration Performance Guide
Subject	04D	Medication Disposal Log
Subject	04E	Medication Administration Record
Subject	04F	Medication Administration Leave of Absence Form
Subject	05	Scheduling
Subject	05A	MAWC Scheduling Checklist
Subject	06	Vehicle Fuel Purchasing
Subject	07	Cellular Phone Usage

Subject	09	Action Notice-Appeals-Complaints
Subject	09A	MAWC Consumer Grievance Form
Subject	09B	Action Notice and Hearing Rights Form
Subject	10	Emergency Cell Phones
Subject	10A	Emergency Cell Phone Checkout Form
Subject	11	Intake
Subject	11A	MAWC Intake-Renewal Packet
Subject	11B	MAWC Authorization to Obtain-Disclose
Subject	11C	Criminal Records Consent
Subject	12	Building Closure
Subject	13	Discharge
Subject	14	Assessment
Subject	15	Respite Policy

Chapter 6 - Financial Management Services

Subject	01	Administration
Subject	02	Definition of Fiscal Intermediary Role
Subject	03	Staying up to date with State and Federal Agencies
Subject	03A	Verification Matrix
Subject	04	Staying up to date with Benefits and Services
Subject	05	Record Management
Subject	06	Contracts with Agencies
Subject	07	Agency prepayment, billing and reimbursement
Subject	08	Call Response Time
Subject	09	Late Disbursement Notification Procedure
Subject	10	Person Served Satisfaction Surveys
Subject	10A	Agency Satisfaction Survey
Subject	10B	Participant Survey MI & WI
Subject	10C	Participant Survey NC
Subject	11	Communication with Support Coordinators
Subject	12	Consumer Enrollment Meeting
Subject	12A	Michigan Power of Attorney Review
Subject	13	Consumer Enrollment Package
Subject	14	Receipt of Time Reports
Subject	15	Receipt of Consumer Related Invoices other than Time Reports
Subject	16	Consumer Intake
Subject	17	Consumer Representatives
Subject	18	Consumer Termination
Subject	18A	Termination of Services Checklist
Subject	18B	Employee Termination Checklist
Subject	19	Processing Payments
Subject	20	Monthly Consumer Reports
Subject	21	Roles in Self-Determination

Subject	22	Tracking Communication and Complaints
Subject	23	Check Distribution Policy
Subject	24	Processing Tax Filings
Subject	25	Garnishments
Subject	26	Unclaimed Property
Subject	27	FICA Refunds
Subject	28	Utilization Review
Subject	29	Transfer of Fiscal Intermediary
Subject	29A	Transfer Requirements
Subject	30	Performance Improvement and Customer Service
Subject	31	Debarment Policy
Subject	32	Preparing Year End Tax Documentation
Subject	33	Agency Access to Electronic Documents
Subject	34	Agency with Choice Co-Employment Model
Subject	34A	AWC Criminal Background Check Consent
Subject	34B	AWC Criminal Background Check Waiver
Subject	34C	AWC Employment Agreement
Subject	34D	AWC Training Record
Subject	34E	AWC Evaluation Questionnaire
Subject	34F	AWC Performance Evaluation
Subject	35	New Employees for Existing Participants
Subject	36	Caregiver Link
Subject	37	Employee Eligibility Requirements
Subject	38	Workers Compensation & Advance Refunds
Subject	39	Hiring and Paying Independent Contractors
Subject	40	Employment and Wage Verification Requests
Subject	41	Renewal of Required Federal and State Forms
Subject	42	Workers' Compensation Policies and Claims
Subject	43	Timesheet Distribution
Subject	44	Internal Auditing
Subject	45	Data Integrity

Chapter 7 – North Carolina Specific Policies

Subject	01	Abuse and Neglect
Subject	01A	Reporting Abuse, Neglect, Exploitation
Subject	02	Protection from Harm, Neglect and Exploitation
Subject	03	Client Grievances
Subject	04	Incident-Accident Reporting and Death Review
Subject	05	Voluntary Uncompensated Work
Subject	06	Search and Seizure
Subject	07	Expulsion and Suspension
Subject	08	Participant Record Management
Subject	09	Fee Policy
Subject	10	Participants Personal Funds
Subject	11	Personnel Requirements

Subject	12	Human Rights Committee
Subject	13	Release of Confidential Information to the HRC
Subject	14	North Carolina Abbreviations
Subject	15	Crisis Planning
Subject	15A	Crisis Plan Sample Format
Subject	16	Quality Assurance
Subject	17	Client Rights - Use of Restrictive Intervention
Subject	17A	Restrictive Intervention Log
Subject	18	Client Rights Training on Alternatives to Restrictive Interventions
Subject	19	Criteria for Admission and Screening
Subject	20	Diagnostic Assessment
Subject	21	Criteria for Discharge
Subject	22	Medication Requirements
Subject	23	Medication Errors
Subject	24	Lab Tests
Subject	25	Primary Crisis Response Service Process

Chapter 8 – Humana/Florida Specific Policies

Subject	01	FL Garnishments
Subject	02	FL Unclaimed Property
Subject	03	FL Specific Performance Metrics
Subject	04	Employee Eligibility
Subject	04A	Affidavit of Compliance with Screening Requirements
Subject	04B	Level 2 Service Providers
Subject	04C	Background Screening Application for Exemption
Subject	05	Critical Incident Reporting
Subject	05A	Critical Incident Report 2015
Subject	05B	LTC Critical Incident Report
Subject	05C	LTC SMMC Report Guide 4-17-13
Subject	06	Utilization Management
Subject	07	Service Documentation
Subject	07A	Humana Timesheet
Subject	07B	Humana Schedule External
Subject	07C	Timesheet Error Processing Guidelines
Subject	08	Worker Management-Humana
Subject	08A	PDO Guideline Manual
Subject	09	Humana Privacy and Security
Subject	09A	Humana Business Associate Agreement
Subject	10	Consumer Intake
Subject	11	Consumer Enrollment Packet
Subject	12	Definition of Fiscal Intermediary Role

Chapter 9 – Agency Specific Policies

Subject	01	VAAA Timesheet Verification & Billing
Subject	02	Termination Checklist – Macomb CMH

Subject	03	Resignation and Termination - Macomb
Subject	04	Employee Eligibility Requirements - Oakland
Subject	05	Employee Eligibility Requirements – Senior Resources
Subject	06	Employee Eligibility Requirements - AAAWMI
Subject	07	AAAWMI Utilization Management Policy
Subject	08	Tri-County Utilization Management Policy
Subject	09	Blue Skies AAA3B Reduced or Non-Service Delivery Policy

Chapter 10 – Minnesota Policies and Procedures

Subject	01	Administration
Subject	02	Definition of Fiscal Intermediary Role
Subject	03	Staying up to date with Agency, Local, State and Federal Requirements
Subject	04	Staying up to Date with Benefits and Services
Subject	05	Record Management
Subject	06	Contracts with Agencies
Subject	07	Agency prepayments, billing and reimbursement
Subject	08	Call Response Time
Subject	09	Late Disbursement Notification Procedure
Subject	10	Person Served Satisfaction Surveys
Subject	10A	Consumer Satisfaction Survey
Subject	10B	Caregiver Satisfaction Survey
Subject	10C	Agency Satisfaction Survey
Subject	11	Collective Bargaining Membership
Subject	12	Consumer Enrollment Meeting
Subject	13	Enrollment Package
Subject	14	Receipt of Time Reports
Subject	15	Receipt of Consumer Related Invoice other than Time Reports
Subject	16	Consumer Intake
Subject	17	Consumer Representatives
Subject	18	Consumer Termination
Subject	18A	Termination of Services Checklist
Subject	18B	Employee Termination Checklist
Subject	19	Processing Payments
Subject	20	Monthly Consumer Report
Subject	20A	Monthly Consumer Report Sample
Subject	21	Roles of Self Determination
Subject	22	Tracking Communication and Complaints
Subject	23	Fax Security and Privacy
Subject	24	Processing Tax Filing
Subject	25	Garnishments
Subject	26	Unclaimed Property
Subject	27	FICA Refunds
Subject	28	Utilization Review
Subject	29	Transfer of Fiscal Intermediary
Subject	29A	Transfer Requirements
Subject	30	Performance Improvement and Customer Service
Subject	31	Debarment Policy
Subject	32	Preparing Year End Tax Documents

Subject	33	Agency Access to Electronic Documents
Subject	34	Incident Reporting
Subject	35	New Employees for Existing Participants
Subject	36	Caregiver Link
Subject	37	Employee Eligibility Requirements
Subject	38	Workers Compensation & Advance Refunds
Subject	39	Hiring and Paying Independent Contractors
Subject	40	Employment and Wage Verification Requests
Subject	41	Renewal of Required Federal and State Forms
Subject	42	Worker's Compensation Policies and Claims
Subject	43	Production and Distribution of Timesheets
Subject	44	Internal Auditing
Subject	45	Data Integrity
Subject	47	Consumer Grievance
Subject	47A	Consumer Grievance Form
Subject	47B	Grievance Notification
Subject	48	Cultural Competence and Limited English Proficiency
Subject	49	Fraud Prevention Program
Subject	50	Communication Accommodations
Subject	51	Voices for Health
Subject	52	HIPAA Policy
Subject	53	HIPAA Privacy Reporting of Data Breaches
Subject	54	Privacy and Security Controls
Subject	55	Disaster Recovery Plan for Computerize Records
Subject	56	IT Security Incident Response Plan
Subject	56A	IT Security Incident Report
Subject	57	Segregation of Duties
Subject	58	Approval of Financial Transactions
Subject	59	Monthly Closing of Financial Statements

Chapter 11 – HAP Policies and Procedures

Subject	1	HAP 2017 Vendor Monitoring
Subject	11	HAP Consumer Grievance

Appendix A– Additional Information

I. PURPOSE: To establish policies and procedures to ensure that the company maintains records in accordance with IRS requirements, as well as Agency requirements.

II. APPLICATION: All programs operated directly or under contract with Community Mental Health or other State Agencies

III. REFERENCE:

IV. DEFINITIONS:

Governmental agencies include but are not limited to Community Mental Health Agencies, Department of Human Services Agencies, Rehabilitation Services, County and State level Area Agencies on Aging.

V. POLICY:

A. The company will maintain originals, of all the documentation developed during the client intake process. (See Policy Chapter 6, Subject 16, Consumer Intake).

B. In addition to the above referenced documents, the Company will maintain the following documents

1. Assignment verification of FEIN
2. Amounts and dates of all wage payments
3. Names, addresses, social security numbers, employer identification numbers and occupations of employees and recipients.
4. Any copies of Forms W-2 and W-2c that were returned as undelivered.
5. Dates of employment of each employee.
6. Periods for which employees were paid while absent due to sickness or injury and the amount of weekly payments made.
7. Copies of employees' income tax withholding allowance certificates (Form W-4).
8. Dates and amounts of tax deposits made and acknowledgement numbers for deposits made by EFTPS
9. Copies of returns filed, including confirmation numbers if e-filed.
10. Records of fringe benefits and expense reimbursement provided to employees, including substantiation.
11. Copies of all State and Federal returns filed.
12. Copies of each client's general ledger

C. Worker's Compensation Policies are maintained at the office of the carrier. Copies are available by request to Customer Service.

D. All records shall be kept for a minimum of 10 years unless specified in an established schedule by GT Independence; or stipulated in a specific contract with an agency being served by GT Independence.

VI. PROCEDURE:

A. Paper documents will be kept is a file folder labeled with the Consumer and Consumer employee name.

B. Electronic records, (G/L) etc will be kept on a server with appropriate backups kept in accordance with our policies, Policy Chapter 2, Subject 08, Disaster Recovery Plan for Electronic Information.

C. Time relevant data, i.e. time reports, quarterly returns, expired Powers of Attorney will be archived annually not later than six month after the end of the year.

D. Archived records will be maintained under lock in a locked room.

E. Access to archived records will be logged in a record management log book kept by administrative services. The log book will contain the time, date, and person accessing the records.

F. Access to written records will be administered by a designated GT Independence staff member. Records are not allowed to be removed from the facility where they are stored.

G. Files may not be left on desktops and must be immediately returned to the appropriate filing facility when not in use.

H. No record may be removed without documentation of removal by the authorized GT staff member on the official record log sheet.

I. Audits will be conducted to review files to assure proper documentation in accordance with policy 6-44.

VII. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually by Operations and the Chief Executive Officer.

GT Independence Disaster Recovery Plan

Table of Contents

Introduction **1**
Purpose 1
Scope 1
Disaster Recovery Teams & Responsibilities **1**
Facilities Team 3
Network Team 4
Server Team 5
Applications Team 6
Senior Management Team 7
Disaster Recovery Call Tree **8**
Data and Backups 10
Communicating the Disaster 11
Communicating with Employees 11
Communicating with Clients 11
Communicating with the Media 11
Dealing with a Disaster **11**
Disaster Identification and Declaration 12
DRP Activation 12
Assessment of Current and Prevention of Further Damage 12
Restoring IT Functionality **14**
IT Systems 14
Plan Testing & Maintenance **14**

Introduction

This Disaster Recovery Plan (DRP) captures, in a single repository, all of the information that describes GT Independence's ability to withstand a disaster as well as the processes that must be followed to achieve disaster recovery.

Purpose

Note that in the event of a disaster the first priority of GT Independence is to prevent the loss of life. Before any secondary measures are undertaken, GT Independence will ensure that all employees, and any other individuals on the organization's premises, are safe and secure.

After all individuals have been brought to safety, the next goal of GT Independence will be to enact the steps outlined in this DRP to bring all of the organization's groups and departments back to business-as-usual as quickly as possible. This includes:

- *Preventing the loss of the organization's resources such as hardware, data and physical IT assets*
- *Minimizing downtime related to IT*
- *Keeping the business running in the event of a disaster*

This DRP document will also detail how this document is to be maintained and tested.

Scope

The GT Independence DRP takes all of the following areas into consideration:

- *Network Infrastructure*
- *Servers Infrastructure*
- *Telephony System*
- *Data Storage and Backup Systems*
- *Data Output Devices*
- *End-user Computers*
- *Organizational Software Systems*
- *Database Systems*
- *IT Documentation*

Disaster Recovery Teams & Responsibilities

In the event of a disaster, different groups will be required to assist the IT department in their effort to restore normal functionality to the employees of GT Independence. The different groups and their responsibilities are as follows:

- *Disaster Recovery Lead(s)*
- *Security Team*
- *Facilities Team*
- *Network Team*
- *Server Team*
- *Applications Team*
- *Operations Team*
- *Management Team*

The lists of roles and responsibilities in this section have been created by GT Independence and reflect the likely tasks that team members will have to perform. Disaster Recovery Team members will be responsible for

performing all of the tasks below. In some disaster situations, Disaster Recovery Team members will be called upon to perform tasks not described in this section.

Disaster Recovery Lead

The Disaster Recovery Lead is responsible for making all decisions related to the Disaster Recovery efforts. This person's primary role will be to guide the disaster recovery process and all other individuals involved in the disaster recovery process will report to this person in the event that a disaster occurs at GT Independence, regardless of their department and existing managers. All efforts will be made to ensure that this person be separate from the rest of the disaster management teams to keep his/her decisions unbiased; the Disaster Recovery Lead will not be a member of other Disaster Recovery groups in GT Independence.

Role and Responsibilities

- *Make the determination that a disaster has occurred and trigger the DRP and related processes.*
- *Initiate the DR Call Tree.*
- *Be the single point of contact for and oversee all of the DR Teams.*
- *Organize and chair regular meetings of the DR Team leads throughout the disaster.*
- *Present to the Management Team on the state of the disaster and the decisions that need to be made.*
- *Organize, supervise and manage all DRP test and author all DRP updates.*

Contact Information

Name	Role/Title	Work Phone Number	Home Phone Number	Mobile Phone Number
Patrick Hoelscher	*Primary Disaster Lead*	*269-503-7566*	*269-221-6294*	*269-903-8678*
Ashlee Gardner	*Secondary Disaster Lead*		*574-370-2234*	*269-503-2045*

Facilities Team

The Facilities Team will be responsible for all issues related to the physical facilities that house IT systems. They are the team that will be responsible for ensuring that the standby facilities are maintained appropriately and for assessing the damage too and overseeing the repairs to the primary location in the event of the primary location's destruction or damage.

Role & Responsibilities

- *Ensure that the standby facility is maintained in working order*
- *Assess, or participate in the assessment of, any physical damage to the primary facility*
- *Ensure that measures are taken to prevent further damage to the primary facility*
- *Work with insurance company in the event of damage, destruction or losses to any assets owned by GT Independence*
- *Ensure that appropriate resources are provisioned to rebuild or repair the main facilities in the event that they are destroyed or damaged*
- *After GT Independence is back to business as usual, this team will be required to summarize any and all costs and will provide a report to the Disaster Recovery Lead summarizing their activities during the disaster*

Contact Information

Name	Role/Title	Work Phone Number	Home Phone Number	Mobile Phone Number
Matt Barnell	*Facilities Supervisor*			
Mike Miller	*CFO*			

Network Team

The Network Team will be responsible for assessing damage specific to any network infrastructure and for provisioning data and voice network connectivity including WAN, LAN, and any telephony connections internally within the enterprise as well as telephony and data connections with the outside world. They will be primarily responsible for providing baseline network functionality and may assist other IT DR Teams as required.

Role & Responsibilities

- *In the event of a disaster that does not require migration to standby facilities, the team will determine which network services are not functioning at the primary facility*
- *If multiple network services are impacted, the team will prioritize the recovery of services in the manner and order that has the least business impact.*
- *If network services are provided by third parties, the team will communicate and co-ordinate with these third parties to ensure recovery of connectivity.*
- *In the event of a disaster that does require migration to standby facilities the team will ensure that all network services are brought online at the secondary facility*
- *Once critical systems have been provided with connectivity, employees will be provided with connectivity in the following order:*
    - *All members of the DR Teams*
    - *All C-level and Executive Staff*
    - *All IT employees*
    - *All remaining employees*
- *Install and implement any tools, hardware, software and systems required in the standby facility*
- *Install and implement any tools, hardware, software and systems required in the primary facility*
- *After GT Independence is back to business as usual, this team will be summarize any and all costs and will provide a report to the Disaster Recovery Lead summarizing their activities during the disaster*

Contact Information

Name	Role/Title	Work Phone Number	Home Phone Number	Mobile Phone Number
Ashlee Gardner	*IT Administrator*	*269-651-4500*	*574-370-2234*	*269-503-2045*
Bryan Valdes	*IT Systems Technician*			*810-471-8655*
Nick Jojola	*IT Systems Engineer*			*269-503-0670*
Patrick Hoelscher	*IT Director*	*269-503-7566*	*269-221-6294*	*269-903-8678*

Server Team

The Server Team will be responsible for providing the physical server infrastructure required for the enterprise to run its IT operations and applications in the event of and during a disaster. They will be primarily responsible for providing baseline server functionality and may assist other IT DR Teams as required.

Role & Responsibilities

- *In the event of a disaster that does not require migration to standby facilities, the team will determine which servers are not functioning at the primary facility*
- *If multiple servers are impacted, the team will prioritize the recovery of servers in the manner and order that has the least business impact. Recovery will include the following tasks:*
  - *Assess the damage to any servers*
  - *Restart and refresh servers if necessary*
- *Ensure that secondary servers located in standby facilities are kept up-to-date with system patches*
- *Ensure that secondary servers located in standby facilities are kept up-to-date with application patches*
- *Ensure that secondary servers located in standby facilities are kept up-to-date with data copies*
- *Ensure that the secondary servers located in the standby facility are backed up appropriately*
- *Ensure that all of the servers in the standby facility abide by GT Independence's server policy*
- *Install and implement any tools, hardware, and systems required in the standby facility*
- *Install and implement any tools, hardware, and systems required in the primary facility*
- *After GT Independence is back to business as usual, this team will be summarize any and all costs and will provide a report to the Disaster Recovery Lead summarizing their activities during the disaster*

Contact Information

Name	Role/Title	Work Phone Number	Home Phone Number	Mobile Phone Number
Ashlee Gardner	*IT Administrator*	*269-651-4500*	*574-370-2234*	*269-503-2045*
Nick Jojola	*IT Systems Technician*			*269-503-0670*

Applications Team

The Applications Team will be responsible for ensuring that all enterprise applications operates as required to meet business objectives in the event of and during a disaster. They will be primarily responsible for ensuring and validating appropriate application performance and may assist other IT DR Teams as required.

Role & Responsibilities

- *In the event of a disaster that does not require migration to standby facilities, the team will determine which applications are not functioning at the primary facility*
- *If multiple applications are impacted, the team will prioritize the recovery of applications in the manner and order that has the least business impact. Recovery will include the following tasks:*
    - *Assess the impact to application processes*
    - *Restart applications as required*
    - *Patch, recode or rewrite applications as required*
- *Ensure that secondary servers located in standby facilities are kept up-to-date with application patches*
- *Ensure that secondary servers located in standby facilities are kept up-to-date with data copies*
- *Install and implement any tools, software and patches required in the standby facility*
- *Install and implement any tools, software and patches required in the primary facility*
- *After GT Independence is back to business as usual, this team will be summarize any and all costs and will provide a report to the Disaster Recovery Lead summarizing their activities during the disaster*

Contact Information

Name	Role/Title	Work Phone Number	Home Phone Number	Mobile Phone Number
Kyle Thompson	*Systems Engineer*			
William Yearling	*Software Developer*			

Senior Management Team

The Senior Management Team will make any business decisions that are out of scope for the Disaster Recovery Lead. Decisions such as constructing a new data center, relocating the primary site etc. should be made by the Senior Management Team. The Disaster Recovery Lead will ultimately report to this team.

Role & Responsibilities

- *Assist the Disaster Recovery Team Lead in his/her role as required*
- *Make decisions that will impact the company. This can include decisions concerning:*
  - *Rebuilding of the primary facilities*
  - *Rebuilding of data centers*
  - *Significant hardware and software investments and upgrades*
  - *Other financial and business decisions*

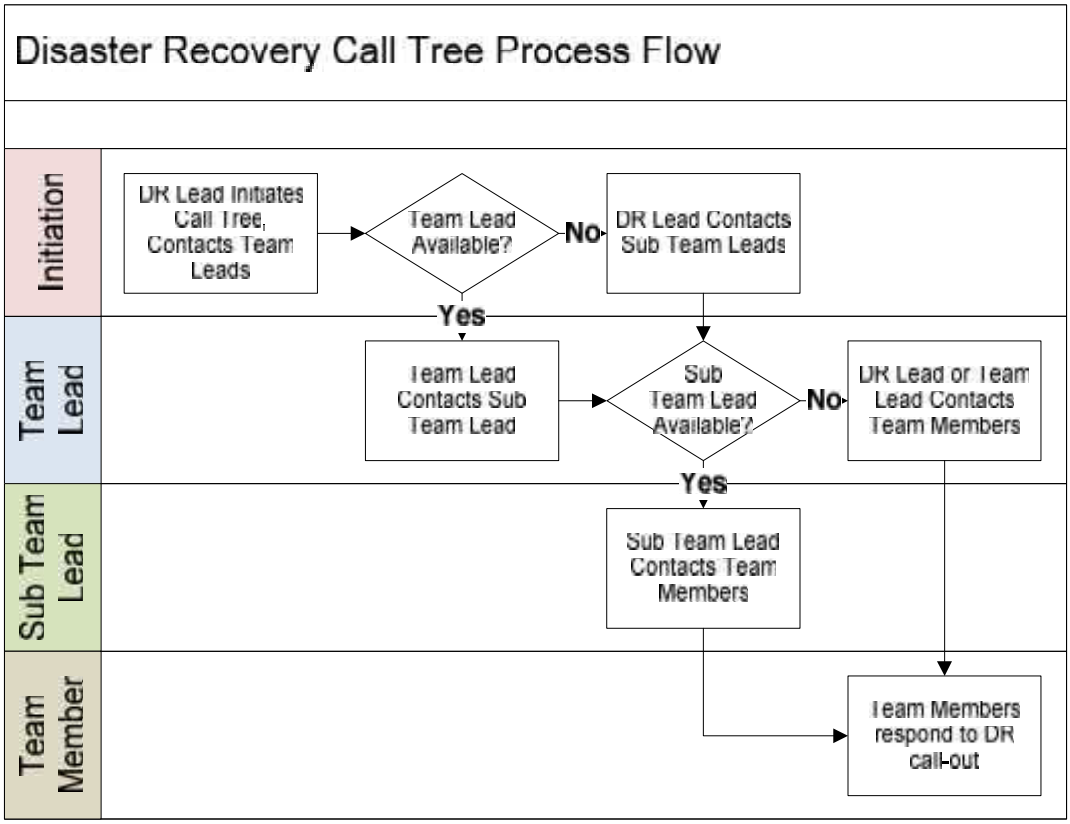
Name	Role/Title
John Carmichael	*CEO*
Holly Carmichael	*COO*
Mike Miller	*CFO*
Chris Taylor	*Director, Compliance*
Kathryn Meyers	*Director, Human Resources*
Rob Lewis	*Director, Field Operations*
Adam Kujacznski	*Director, Marketing*
Patrick Hoelscher	*Director, Information Technology*

Disaster Recovery Call Tree

In a disaster recovery or business continuity emergency, time is of the essence so GT Independence will make use of a Call Tree to ensure that appropriate individuals are contacted in a timely manner.

- The Disaster Recovery Team Lead calls all Level 1 Members (Blue cells)
- Level 1 members call all Level 2 team members over whom they are responsible (Green cells)
- Level 1 members call all Level 3 team members over whom they are directly responsible (Beige cells)
- Level 2 Members call all Level 3 team members over whom they are responsible (Beige cells)
- In the event a team member is unavailable, the initial caller assumes responsibility for subsequent calls (i.e. if a Level 2 team member is inaccessible, the Level 1 team member directly contacts Level 3 team members).

Contact	Office	Mobile	Home
DR Lead *Patrick Hoelscher*	269-503-7566	269-903-8678	269-221-6294
Facilities Team Lead		269-503-2873	
Facilities Team 1			
Network Team Lead		574-370-2234	
LAN Team 1			
Applications Team Lead		269-503-2045	
App Team			
Management Team			


Disaster Recovery Call Tree Process Flow
Initiation
Team Lead
Sub Team Lead
Team Member
DR Lead Initiates Call Tree, Contacts Team Leads
Team Lead Available?
No
DR Lead Contacts Sub Team Leads
Yes
Team Lead Contacts Sub Team Lead
Sub Team Lead Available?
No
DR Lead or Team Lead Contacts Team Members
Yes
Sub Team Lead Contacts Team Members
Team Members respond to DR call-out

Data and Backups

This section lists all of the organization's data as well as where it is backed up and replicated to. Use this information to locate and restore data in the event of a disaster.

Data in Order of Criticality

Rank	Data	Data Type	Back-up Frequency	Backup Location(s)
1	Participant/Employee Data, Call Log, ERP, Financial, HR	Personally identifying information	Hourly replication during business hours; Backups daily	Off-site >> Hatch building Sturgis, MI
2	File Servers	Personally identifying information	Hourly replication during business hours; Backups daily	Off-site >> Hatch building Sturgis, MI
3	Domain Controllers	Confidential	Replication 3 times per day	Off-site >> Hatch building Sturgis, MI
4	Participant/Employee Documents	Personally identifying information	Hourly replication, backups twice daily	Off-site >> Hatch building Sturgis, MI
5	Internal business documents	Confidential	Hourly replication, Backups daily	Off-site>> Hatch building Sturgis, MI
6	Email	Confidential	Replication every 2 hours; Daily Backups	Off-site>> Hatch building Sturgis, MI
7				
8				
9				
10				

Communicating the Disaster

Communicating with Employees

Communicating with employees is critical in the event of a disaster. Our phone system is a cloud based system that can be accessed from anywhere. The host has multiple failover datacenters. Our on-premise fax and email servers are setup to failover to a duplicate host. We also maintain an emergency contact list.

The employees will need to be informed of the following:

- *Whether it is safe for them to come into the office*
- *Where they should go if they cannot come into the office*
- *Which services are still available to them*
- *Work expectations of them during the disaster*

Communicating with Clients

After GT Independence employees have been informed of the disaster, remote call center capabilities will be enabled. The remote call center will inform clients of the following:

- *Anticipated impact on service offerings*
- *Anticipated impact on security of client information*
- *Anticipated timelines*

Communicating with the Media

After all of the organization's employees have been informed of the disaster, the Communications Team will be responsible for informing media outlets of the disaster, providing the following information:

- *An official statement regarding the disaster*
- *The magnitude of the disaster*
- *The impact of the disaster*
- *Anticipated timelines*

Dealing with a Disaster

If a disaster occurs in GT Independence, the priority is to ensure that all employees are safe and accounted for. After this, steps must be taken to mitigate any further damage to the facility and to reduce the impact of the disaster to the organization.

Regardless of the category that the disaster falls into, dealing with a disaster can be broken down into the following steps:

1) Disaster identification and declaration
2) DRP activation
3) Communicating the disaster
4) Assessment of current and prevention of further damage
5) Standby facility activation

6) Establish IT operations
7) Repair and rebuilding of primary facility

Disaster Identification and Declaration

Since it is almost impossible to predict when and how a disaster might occur, GT Independence must be prepared to find out about disasters from a variety of possible avenues. These can include:

- *First hand observation*
- *System Alarms and Network Monitors*
- *Environmental and Security Alarms in the Primary Facility*
- *Security staff*
- *Facilities staff*
- *End users*
- *3rd Party Vendors*
- *Media reports*

Once the Disaster Recovery Lead has determined that a disaster had occurred, s/he must officially declare that the company is in an official state of disaster. It is during this phase that the Disaster Recovery Lead must ensure that anyone that was in the primary facility at the time of the disaster has been accounted for and evacuated to safety according to the company's Evacuation Policy.

While employees are being brought to safety, the Disaster Recovery Lead will instruct the Communications Team to begin contacting the Authorities and all employees not at the impacted facility that a disaster has occurred.

DRP Activation

Once the Disaster Recovery Lead has formally declared that a disaster has occurred s/he will initiate the activation of the DRP by triggering the Disaster Recovery Call Tree. The following information will be provided in the calls that the Disaster Recovery Lead makes and should be passed during subsequent calls:

- *That a disaster has occurred*
- *The nature of the disaster (if known)*
- *The initial estimation of the magnitude of the disaster (if known)*
- *The initial estimation of the impact of the disaster (if known)*
- *The initial estimation of the expected duration of the disaster (if known)*
- *Actions that have been taken to this point*
- *Actions that are to be taken prior to the meeting of Disaster Recovery Team Leads*
- *Scheduled meeting place for the meeting of Disaster Recovery Team Leads*
- *Scheduled meeting time for the meeting of Disaster Recovery Team Leads*
- *Any other pertinent information*

If the Disaster Recovery Lead is unavailable to trigger the Disaster Recovery Call Tree, that responsibility shall fall to the Disaster Management Team Lead

Assessment of Current and Prevention of Further Damage

Before any employees from GT Independence can enter the primary facility after a disaster, appropriate authorities must first ensure that the premises are safe to enter.

The first team that will be allowed to examine the primary facilities once it has been deemed safe to do so will be the Facilities Team. Once the Facilities Team has completed an examination of the building and submitted its report to the Disaster Recovery Lead, the Disaster Management, Networks, Servers, and Operations Teams will be allowed to examine the building. All teams will be required to create an initial report on the damage and provide this to the Disaster Recovery Lead within 48 hours of the initial disaster.

During each team's review of their relevant areas, they must assess any areas where further damage can be prevented and take the necessary means to protect GT Independence's assets. Any necessary repairs or preventative measures must be taken to protect the facilities; these costs must first be approved by the Disaster Recovery Team Lead.

Restoring IT Functionality

Should a disaster actually occur and GT Independence need to exercise this plan, this section will be referred to frequently as it will contain all of the information that describes the manner in which information system will be recovered.

IT Systems

Rank	IT System	System Components (In order of importance)
1	Communications	Customer Service Phone Lines, Customer Service Email, Fax Servers, Authentication
2	Business Systems	SQL Server, ERP, Payroll Management Systems, Application Servers
3	Document Management	M-Files, File Servers
4	Secure FTP	FTP Server
5	Monitoring	WSUS, SolarWinds, Security Management
6	Backups	Replication and Shadow Copies
7	Remote Desktops	Terminal Servers for remote work
8	Reporting	Report Servers
9	Print Services	Print Servers

Plan Testing & Maintenance

This plan will need to be tested on a periodic basis to discover errors and omissions and will need to be maintained to address them. At a minimum, the following critical pieces to DR plan will be tested on a schedule.

Core Function	Frequency
Headquarters Facility Generator	Weekly
Server & Data Replication	Monthly
Backup Archives	Monthly

I. PURPOSE: To establish policies and procedures for conducting a Consumer Enrollment meeting.

II. APPLICATION: All programs operated directly or under contract with Community Mental Health or other State Agencies.

III. REFERENCE:

IV. DEFINITIONS: Governmental agencies include but are not limited to Community Mental Health Agencies, Department of Human Services Agencies, Rehabilitation Services, County and State level Area Agencies on Aging. Self determination activities include those services provided by the contracting Agency included in the Self Determination budget submitted by the agency and the consumer.

V. POLICY:

A. GT Independence will communicate with self determination participants and their employees to assure that they understand the principles of self determination, the role of the fiscal intermediary, their role in the program, and the rules, conventions, and regulations that govern the employment of staff.

B. Whenever possible, Field Service Representatives will convene an enrollment meeting to include the self determination participant, his/her supports coordinator, employees, and others who are part of the participant's circle of support.

C. Field Service Representatives will explain the required forms and their purpose within the program.

D. Field Service Representatives will test for understanding of the issues described above during the course of communication with participants, employees, supports coordinators and others.

VI. PROCEDURE:

A. During the initial communication with the Supports Coordinator, the Field Service Representative will seek to schedule the enrollment meeting. The Field Service Representative will be responsible for confirming the meeting time and place. If the participant cannot be contacted then the Field Service Representative will seek assistance from the Supports Coordinator to set up a meeting.

B. At the enrollment meeting the Field Service Representative will wear their identification badge with their picture visible, and will provide the badge for inspection upon request.

C. The Field Service Representative will review the role of the Supports Coordinator, the role of the Fiscal Intermediary, and the role of the participant as they relate to the self determination process.

D. At the enrollment meeting the Field Service Representative will review each document required by the participant or his/her employee in order to comply with Agency, State, and Federal requirements.

E. The Field Service Representative will seek to answer any questions and advise the participants of their right to have the documents reviewed by an attorney. The Field Service Representative will review the forms to ensure they are completed and signed.

F. If the participant desires to further review the document or have them reviewed by legal counsel then the Field Service Representative will leave the documents which can be signed and returned at a later date. If the participant chooses not to complete the necessary paperwork for the program then the Field Service Representative will honor their decision and the supports coordinator will be contacted such that alternative arrangements can be made.

I. PURPOSE: To register new consumers in the GT process.

II. APPLICATION: All programs operated directly or under contract with Community Mental Health or other State Agencies

III. REFERENCE:

A. Internal Revenue Code

V. DEFINITIONS:
N/A.

VI. POLICY: GT Independence is committed to providing services in a uniform cost effective manner. Documentation is the cornerstone of our Fiscal Intermediary business. In order to establish a uniform and effective level of service, it is essential that all consumer files contain the documents listed in this procedure. All documents and procedures relating those documents will be reviewed annually.

VII. PROCEDURE:

A. Field Services
1. Obtain completed Participant Information Form from Waiver Agent
2. Send the Enrollment Packet within 3 days.
3. Obtain completed Employee Application and Background Check Consent form from Waiver Agent
4. Complete Background Check for potential employee(s)
5. Send Hiring Packet within 3 business days.
6. Confirm the authorization period for the services to be covered under the consumer agreement.
7. Complete a consumer Budget.
8. Send a Participant Packet within 3 business days.
9. Establish a time for the kick off meeting
10. Enter Participant data in Client PDF file and print forms for meeting
11. Enter Employee data in Employee PDF file and print forms for meeting
12. After meeting is completed, review forms for errors and forward file to Customer Service Associate within 24 hours.

B. Customer Service Associate
1. Process within 48 hours of receipt.
2. Upon receipt of consumer file: Complete Consumer Processing Checklist
3. Create new “company” in accounting software
4. Enter budget data for the client
5. Submit Workman’s Compensation policy for client (if applicable)
6. Submit all IRS and State tax paperwork
7. Complete Employee Processing Checklist
8. Set up new employees in the accounting software
9. Complete I-9 documentation (if not previously completed by the Field Representative)
10. Enter Caregiver Applications online (if applicable)
11. Log training activity for each employee

C. File Review
1. All files will be processed utilizing a file review/processing checklist.
2. Customer Service Associates submit files to their Team Leader or other designee for final review.

VIII. REVIEW RESPONSIBILITY:
This policy and associated procedures shall be reviewed annually.

I. **PURPOSE**: To retire terminated consumers who are no longer participants/employers.

II. **APPLICATION**: All programs operated directly or under contract with Community Mental Health or other State Agencies

III. **REFERENCE**:

A. Internal Revenue Code

V. **DEFINITIONS**: N/A.

VI. **POLICY**: GT Independence will complete the documentation required to terminate the registration of a participant when their relationship with GT Independence ends. There are different scenarios for terminating the participant's registration.

A. When a participant changes fiscal intermediaries
B. When a participant is no longer a participant in self determination with employees.

VII. **PROCEDURE**:

A. When a participant changes Fiscal Intermediaries.
   1. Terminate the Federal Power of Attorney, (Form 2848). Send a copy of the Power of Attorney to the Internal Revenue Service at the same address that the original Power of Attorney was submitted. Write "REVOKE" across the top of the form 2848. If you do not have a copy of the Power of Attorney, send a statement to the IRS indicating that the power of attorney is being revoked, list the tax matters covered, and submit to the CFO for signature.
   2. Terminate the Federal Employer Appointment of Agent,(Form 2678) Send a copy of the Employer Appointment of Agent application, (Form 2678) to the address that the form was originally was sent to. Write "REVOKE" across the top of the form. Submit to CFO for signature
   3. Terminate Tax Information Authorization,(Form 8821). Send a copy of the Tax Authorization Information form to the address that the form was originally sent to. Write "REVOKE" across the top of the form. Submit to CFO for signature.
   4. Revoke the applicable state forms.
      1. Michigan
         a. Complete Michigan Department of Treasury Form 151, Power of Attorney. Check the box on the second line of Part 4: Change in Power of Attorney. To revoke our Power of Attorney, indicate that the revocation is for both Treasury and UIA. Forward to the consumer or his representative for signature.
         b. Terminate form 3683, Payroll Service Provider by writing revoke across the top of the form and submit it to the CFO for signature. Mail the form to the address indicated on the form.
      2. Wisconsin
         a. The Power of Attorney, A-222 will be revoked upon receipt of the new agent's Power of Attorney.
      3. North Carolina
         a. The Power of Attorney, GEN-58 will be revoked upon receipt of the new agent's Power of Attorney.
      4. Florida
         a. The Power of Attorney, DR-835 will be revoked upon receipt of the new agent's Power of Attorney.

5. Contact the successor Fiscal Intermediary to make sure that he/she to identify the document they will require from us in order for them to provide support.

B. When a participant is no longer a participant in self determination and no longer has employees.
   1. Perform steps 1 – 4 above.
   2. File and pay the final State Income Tax Voucher
   3. Complete State specific Department of Treasury Form(s) See number 4.
   4. File and pay the final State Unemployment Tax form.
   5. Notify the Unemployment Insurance Agency by filing State specific UIA Form(s).
   6. Complete the final 941, Employer's Quarterly Tax Return and indicate in Part III that it is the final return
   7. Notify the Internal Revenue Service that the Employer Identification Number is to be retired. If the participant is deceased, indicate so in the letter.
   8. Notify the Agency that steps 1 – 7 have been performed.

C. Participant access to documents after termination
   1. Participants can request copies of documents at their convenience via phone.
   2. GT staff will verify the participant's identity and mail the requested documents within 48 hours.

D. GT will keep a copy of the termination checklist in the clients file.
   1. The checklist will be completed by Customer Service Associate and reviewed by the Customer Service Associate Team Leader.

E. GT will keep all terminated client files a minimum of 10 years.

VIII. REVIEW RESPONSIBILITY

This policy and associated procedures will be reviewed annually.

I. **PURPOSE:**
To establish policies and procedures to ensure effective delivery of Fiscal Intermediary Services.

II. APPLICATION:
All programs operated directly or under contract with Community Mental Health or other State Agencies.

III. REFERENCE:

IV. DEFINITIONS:

V. POLICY:
GT Independence will renew all required federal and state forms in a timely manner.
Federal:
- IRS Form 8821, Tax Information Authorization

State
- Alabama
  - Department of Revenue Form 2848A, Power of Attorney and Declaration of Representative

VI. PROCEDURES:
a. Customer Service will enter into the system expiration dates for any required federal and state forms. This is typically the end of a calendar year.
b. Customer Service will generate a list of expired in November of the year preceding the expiration and do a mass mailing of forms to be renewed.
   i. Once an updated form is received the expiration date will be updated in the system.
   ii. An additional mailing will be completed in December for those who have not provided the renewed form.
c. The Customer Service Manager is responsible for the oversight and completion of this project.

VII. REVIEWS RESPONSIBILITY:
This policy and associated procedures shall be reviewed annually.

I. PURPOSE: To ensure all contracted agencies have secure access to required documents.

II. APPLICATION:
The policies and procedures stated herein apply to all GT Independence employees.

III. REFERENCE:
N/A

IV. DEFINITIONS:
FTP Access - A secure method of file transfer using SSL encryption. GT Independence hosts its own FTP portal for client (portal) services for our contracting agencies to connect to GT to exchange important or large files via the web while maintaining HIPPA Compliance. Our FTP site meets HIPPA, SEC, and FINRA compliances through the use of firewalls, SSL encryption of data transmitted between parties and the direct connection between contracting agencies and GT systems.

V. POLICY:
GT Independence will provide contracted agencies secure access to relevant electronic documents.

VI. PROCEDURES:

a. Contract agency will submit a written notification that they are requesting access to their electronic information via the FTP portal.
    i. This request can be submitted by means of an email if it does not contain any consumer names.
    ii. If the request contains protected health information it must be submitted via fax.
    iii. Requests may be directed to the identified Customer Services Associate, Controller or Network Administrator.
b. The agency/person requesting access will receive an email from GT Independence IT Staff to confirm their identity.
c. Upon account creation the agency client user will be sent their login name, followed by a separate notice containing their passwords. This procedure meets HIPPA compliance for security and distribution of sensitive credentials.
d. The person logging in will then see their own files and can look for any of their requested documents.
e. Nearly any type of document may be exchanged through the FTP portal.
    i. Such documents may include timesheets, reports, billing information, payroll information, or other requested documents.
    ii. Whenever information is added to the contract agencies folders and email notification is sent to the registered agency.
f. The time necessary to set up an agency in FTP Portal will vary based upon their initial request and may range from one workday to 7 workdays.

VII. REVIEW RESPONSIBILITY
This policy and associated procedures will be reviewed annually.

I. PURPOSE: To establish policies and procedures for preparing monthly reports for self determination participants.

II. APPLICATION: All programs operated directly or under contract with Community Mental Health or other State Agencies

III. REFERENCE:

IV. DEFINITIONS:

Governmental agencies include but are not limited to Community Mental Health Agencies, Department of Human Services Agencies, Rehabilitation Services, County and State level Area Agencies on Aging. Self determination activities include those services provided by the contracting Agency included in the Self Determination budget submitted by the agency and the consumer.

V. POLICY:

A. GT Independence will prepare monthly reports for each active self-determination participant.

B. Reports will be simple, easy to read and understand.

C. Self-determination participants will be notified as to who is receiving the report.

D. Reports will be distributed not later than the 15th of the following month.

VI. PROCEDURE:

A. For each consumer, the Financial Services personnel will compare the Access database and the accounting software to assemble financial data in the format approved by the Chief Financial Officer.

B. The required format will be as follows: Sample Consumer Report.

C. Reports will be verified again for usage accuracy.

D. Reports will be mailed or made available on the Server for those designated to receive usage reports which include but are not limited to the Consumer and the Agency.

VII. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

I. PURPOSE: To assure that all Federal, State and Local Tax Documentation is completed for F/EA and Consumers in accordance with IRS guidelines.

II. APPLICATION: All programs operated directly or under contract with Community Mental Health or other State Agencies.

III. REFERENCE:
   A. Internal Revenue Code and Individual state Tax Codes (as applicable).

IV. DEFINITIONS: N/A

V. POLICY: GT Independence is committed to providing services that are in compliance with the procedures and rules defined by the IRS that are relevant to our business.

VI. PROCEDURE:
   A. The CFO will direct the accounting department to conduct the following Federal Tax Reports:
      1. Filing Form 941. Payroll information is pulled from the accounting software under payroll processes. A report called payroll register without 1099 lists the detail for which Form 941 was populated.
      2. Schedule R. Payroll information is pulled to a report for the Schedule R which list payroll and withholdings by Federal Employer Identification Number. The Schedule R, register without 1099 report and the actual Form 941 will be reconciled for total wages and total withholdings.
      3. Schedule B. Payroll software populates the Schedule B from the payroll tax register and must match the Payroll Tax Summary report.
   B. The CFO will direct the accounting department to make the following Federal Deposits
      1. Payroll amounts are monitored daily. When liability exceeds $100,000 per Circular 230, taxes are electronically deposited through the EFTPS system.
      2. The payroll tax summary report is run for the corresponding check dates.
      3. A YTD payroll tax summary is also run and taxes are reconciled to allow for any void or reissued checks after the fact. In the event of quarter end, two deposits are made, one for each quarter.
      4. Total deposits will match Schedule B and the corresponding line item on the Form 941.
      5. Taxes are reconciled monthly to show actual liability at month end. Deposit summaries are kept on hand for reference.
   C. The CFO will direct the accounting department to make the following FUTA payments.
      1. FUTA withholdings are made through the payroll software at 0.8% for the first $7,000 wages per employee plus any FUTA tax credit reductions. FUTA rate is updated yearly per changes to the tax credit reduction.
      2. FUTA deposits are made quarterly. A payroll tax summary is run for the quarter and total amounts of withholdings are deposited via EFTPS. A YTD summary is run to account for any voids or reissues after the fact. Deposit summaries are kept on hand for reference.
   D. The CFO will direct the accounting department to monitor the IRS website regarding the Advanced Earned Income credit due to the repeal effective 1/1/2011.
   E. The CFO will direct the accounting department to make the following State income tax deposits.
      1. Michigan
         a. Aggregate Michigan taxes are deposited monthly no later than the 20th of the following month. A payroll tax summary is run for the period as well as a YTD summary to find any voids or reissues after the fact.
         b. Form 165 Annual Tax Reconciliation is filed by the Accounting department and total wages and tax withholding must match the W-2 total.
         c. Documentation is maintained in the client's hard file as recognition by the State of Michigan that the Consumers ID is to be filed under GT's aggregate account. These include: 518 Michigan Tax Registration, Form 151 Power of Attorney Authorization, and Form 3683 Payroll Service Provider Combined Power of Attorney.

2. Wisconsin individual deposits are made through the Department of Revenue website.
    a. A payroll summary is run for all Wisconsin agencies and taxes are deposited either monthly or quarterly depending on the filing frequency. A spreadsheet is maintained to show each employer's payments to be used on their year end reconciliation W-7. Year end reconciliation must match W-2's and that year's payroll journal.
    b. Documentation maintained in the Wisconsin client's hard file for recognition by the Sate of Wisconsin that the Consumers ID is to be file by GT are: BTR 101 Application for Business Tax Registration and form A-222 Power of Attorney.
3. North Carolina Department of Revenue
    a. To make deposits, the Access database creates the personalized return NC-5. The form is populated with the withholding data, mass printed and a batch check with adding tape attached.
    b. The Accounting department will file the annual reconciliation, NC-3 at year end.
    c. Documentation is maintained in the client's hard file which shows recognition by the State of North Carolina for that employer ID to be filed by GT Independence. These include: NC-BR Application for Business Tax Registration and Gen-58 Power of Attorney.

F. The CFO will direct the Accounting department to make the following State Unemployment tax payments.
1. Individual tax ID's each file separately.
2. The Accounting department will prepare Unemployment forms for each Consumer, verify the data and produce one check per agency batch and mail via US Postal Service to the appropriate State Agency.
    a. Michigan SUTA
        i. Generated returns for Michigan are Form 1020 Employers Quarterly Wage Report and Form 1017 Employers Quarterly Wage Detail. The Payroll software is maintained from the state regarding annual tax rate and SUTA ID number. Each quarter the database is updated for payroll, Employer of Record and Employee SSN. The database is then audited for accuracy in wages and excess wage computations. The database is also audited for the doubling of the wage detail figures for dual clients (multiple clients under the same EIN number). Reports are printed in duplicate and tabulated to get the check amount by agency. A copy is kept for reference and tabulations must match before the check is written.
        ii. If this is the first quarter of eligibility for the EIN, the Forms 518 Michigan Tax Registration, Form 151 Power of Attorney Authorization and Schedule A Liability Questionnaire are sent in to apply for a SUTA ID number. After an employer meets eligibility requirements any prior quarter returns that need filing are printed at that time. Registration paperwork is maintained in the client's hard file.
    b. Wisconsin SUTA
        i. Wisconsin registration and filing unemployment returns are done on the Department of Workforce website. Registration is completed by the Accounting department at the time of filing. A payroll summary is printed from the accounting software for that quarter and wages are manually input into the website. Any excluded employees' wages are accounted for at that time. Payment is made and a record of payment amounts is maintained on a spreadsheet.
        ii. A Letter of Initial Determination for eligible employers as well as their internet access ID is maintained in the client's hard file.
    c. North Carolina
        i. North Carolina returns are printed on form NCUI 101 generated from the accounting software. Registration on form NCUI 604 is done at the time of filing. Any excluded employees' wages are accounted for at the time. Payment is made and record of payment amount is maintained with our hard copy.
        ii. Letters of Liability Determination and Tax Rate are maintained in the client's hard file.
    d. Florida

i. Florida returns are printed on Form RT-6. Record of payment amount is maintained with our hard copy.
ii. Wage reports, contributions, and tax rates are maintained in the client's hard copy file.

G. The CFO will direct the Accounting department to make the following Local Tax Filings and Payments
1. The local W-4 is maintained in the employee's hard file for reference.
2. An SS4 is maintained in the client's hard file from that municipality. A PIN number is assigned from the city so that taxes can be filed and deposited on the municipality's website.
3. A payroll tax summary is run for that employer along with an YTD report to account for any voids or reissues after the fact. A spreadsheet for payments is maintained for reference.

VII. REVIEW RESPONSIBILITY:
This policy and associated procedures shall be reviewed annually.

I. PURPOSE:

To ensure all Federally required year end earnings documentation is prepared and reported.

II. APPLICATION:

The policies and procedures stated herein apply to all GT Independence employees.

III. REFERENCE:

IV. DEFINITIONS:

V. POLICY:

GT Independence will report payments of all Employees and Agencies for services rendered within the IRS guidelines.

GT Independence will provide W2's to all employees per guidelines.

VI. PROCEDURES:

A. W2

1. A final W2 proof is created.
2. The proof is then reconciled to the 941 forms which have been filed quarterly.
3. Upon completion of reconciliation, corrections and/or adjustments are made if necessary.
4. Employee copies of W2's are printed.
5. The file to be transferred to SSA is created.
6. Media to transfer to States taxing agencies are created.
7. Employee W2's are mailed by January 31st of the following year.
8. Files are transferred to various taxing agencies according to each entities timeline.
9. A log of dates of mailing and transmissions is maintained.
10. If adjustments are made after mailing, the W2;s will be corrected and reissued and any relevant submissions will be amended.
11. All W2's are stored electronically. Copies are provided upon request.

B. W3

1. The Controller reconciles the 941 with the W3 and submits to SSA.
2. Reporting to SSA is complete with W2's and W3 by February 28th of the following calendar year if mailed or my March 31st if submitted electronically.
3. W-3's are prepared in the aggregate, per the IRS instructions for all the individuals GT represents.

C. The Chief Financial Officer reviews the annual filings of W-2's and W-3's.

VII. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

I. **PURPOSE:**
To ensure all garnishments received by GT Independence on behalf of Clients and their Employees are recorded and paid as deemed possible.

II. APPLICATION:

Withheld wages and deposits of garnished wages

III. REFERENCE:

IV. DEFINITIONS:

V. POLICY:

GT Independence will execute all garnishments as directed by court orders

VI. PROCEDURES:

A. Upon receipt of a garnishment, Payroll Staff will enter specified amount into the accounting software.
B. Payroll Supervisor will set up the appropriate Vendor to receive payment in the accounting software as a Vendor.
C. When a paycheck is created, the Payroll Staff will verify that the garnishment was withheld at the proper rate and/or percentage of wages.
D. After payroll is complete the Payroll Staff then creates an AP check and mails to the Vendor.
E. The internal control for garnishments consist of reconciliation by the Internal Auditor of accrued garnishments, employee receivable and accounts payable accounts. This insures proper recording of garnishment entries and timely payment. All accounts are reviewed monthly.

VII. REVIEW RESPONSIBILITY:
This policy and associated procedures shall be reviewed annually.

GT Independence

2017 Payroll Schedule M

Pay Period:	Timesheets Due by 5:00 pm:	Payment Date:
Nov. 13 – Nov. 26, 2016	Monday, November 28, 2016	Friday, December 2, 2016
Nov. 27 – Dec. 10, 2016	Monday, December 12, 2016	Friday, December 16, 2016
Dec. 11 – Dec. 24, 2016	Monday, Dec. 26, 2016	Friday, December 30, 2016
Dec. 25 – Jan. 7	Monday, January 9, 2017	Friday, January 13, 2017
Jan. 8 – Jan. 21	Monday, January 23, 2017	Friday, January 27, 2017
Jan. 22 – Feb. 4	Monday, Februray 6, 2017	Friday, February 10, 2017
Feb. 5 – Feb. 18	Monday, February 20, 2017	Friday, February 24, 2017
Feb. 19 – Mar. 4	Monday, March 6, 2017	Friday, March 10, 2017
Mar. 5 – Mar. 18	Monday, March 20, 2017	Friday, March 24, 2017
Mar. 19 – Apr. 1	Monday, April 3, 2017	Friday, April 7, 2017
Apr. 2 – Apr. 15	Monday, April 17, 2017	Friday, April 21, 2017
Apr. 16 – Apr. 29	Monday, May 1, 2017	Friday, May 5, 2017
Apr. 30 – May 13	Monday, May 15, 2017	Friday, May 19, 2017
May 14 – May 27	Monday, May 29, 2017	Friday, June 2, 2017
May 28 – Jun. 10	Monday, June 12, 2017	Friday, June 16, 2017
Jun. 11 – Jun. 24	Monday, June 26, 2017	Friday, June 30, 2017
Jun. 25 – Jul. 8	Monday, July 10, 2017	Friday, July 14, 2017
Jul. 9 – Jul. 22	Monday, July 24, 2017	Friday, July 28, 2017
Jul. 23 – Aug. 5	Monday, August 7, 2017	Friday, August 11, 2017
Aug. 6 – Aug. 19	Monday, August 21, 2017	Friday, August 25, 2017
Aug. 20 – Sept. 2	Monday, September 4, 2017	Friday, September 8, 2017
Sept. 3 – Sept. 16	Monday, September 18, 2017	Friday, September 22, 2017
Sept. 17 – Sept. 30	Monday, October 2, 2017	Friday, October 6, 2017
Oct. 1 – Oct. 14	Monday, October 16, 2017	Friday, October 20, 2017
Oct. 15 – Oct. 28	Monday, October 30, 2017	Friday, November 3, 2017
Oct. 29 – Nov. 11	Monday, November 13, 2017	Friday, November 17, 2017
Nov. 12 – Nov. 25	Monday, November 27, 2017	Friday, December 1, 2017
Nov. 26 – Dec. 9	Monday, December 11, 2017	Friday, December 15, 2017
Dec. 10 – Dec. 23	Monday, December 25, 2017	Friday, December 29, 2017
Dec. 24 – Jan. 6, 2018	Monday, January 8, 2018	Friday, January 12, 2018

Please remember the following about your timesheets:

- Please review the Timesheet Submission Guidelines to assure your timesheet is complete
- Timesheets must be completed with blue or black ink
- Timesheets are to be signed and dated by the employee and the employer
- Signature dates should be in MM/DD/YY format
- Must be completed with printed employer and employee names, dates, times and service type
- Only one entry is allowed per row on the timesheet - submit multiple timesheets if necessary
- Incorrect timesheets will require resubmission of corrected timesheets and will delay payment
- All resubmissions are required to have "REFAX" written at the top of the timesheet
- When working for multiple employers, you must turn in a timesheet for each employer
- Late timesheets will be held until the following pay period
- White-out, ditto marks or lines drawn down the columns are not permitted
- You cannot submit time when the person receiving services is in the hospital
- Timesheets are accepted by e-mail and fax 24 hours per day, 7 days per week – even on holidays

The office will be closed on the following days:

Thursday, November 24, 2016
Friday, November 25, 2016
Friday, December 23, 2016
Monday, December 26, 2016
Monday, January 2, 2017
Monday, May 29, 2017
Tuesday, July 4, 2017
Monday, September 4, 2017
Thursday, November 23, 2017
Friday, November 24, 2017
Monday, December 25, 2017
Tuesday, December 26, 2017
Monday, January 1, 2018

Fax your timesheets to 855-FAX-TO-GT (855-329-8648)
Timesheets are accepted by email at timesheets@gtindependence.com
Timesheets accepted online at portal.gtindependence.com
For assistance call Customer Service at 877-659-4500

*****If your timesheet requires a refax or resubmission your payment will be delayed.**

*****Timesheets submitted that are over the authorized amount may not be eligible for payment. Please only submit time that has been authorized.**

I. PURPOSE: To assure that our services comply with State and Federal promulgations.

II. APPLICATION: All programs operated directly or under contract with Community Mental Health or other State Agencies

III. REFERENCE:
- A. MDCH Medicaid Provider Manual
- B. Internal Revenue Code
- C. State Departments
- D. Federal Funding Accountability and Transparency Act
- E. Patient Protection and Affordable Care Act
- F. United States Department of Labor Regulations
- G. United States Citizenship and Immigration Services Regulations
- H. Americans with Disabilities Act
- I. Age Discrimination in Employment Act
- J. Child Labor Laws
- K. Fair Labor Standards Act
- L. Family and Medical Leave Act
- M. National Labor Relations Act
- N. Occupational Safety and Health Act
- O. Retaliation and Whistleblower Laws
- P. Title VII (Race, National Origin, Religion, and Sex Discrimination)
- Q. Wage and Hour Laws
- R. Worker Adjustment and Retraining Notification Act
- S. Treatment of Uncashed or Cancelled Medicaid Checks 42 CFR 433.40
- T. 42 CFR, part 411, section 12 and part 440, section 167
- U. 42 CFR, part 433, section 40
- V. IRS Revenue Procedure 2013-39 under Section 3504 of the Internal Revenue Code
- W. Designation of Agent by Application 26 CFR 31.3504
- X. National Resource Center for Participant Directed Services (NRCPDS)

IV. DEFINITIONS:
N/A.

V. POLICY: GT Independence is committed to providing services that are in compliance with the procedures and rules defined by the State and Federal Agencies that are relevant to our business.

VI. PROCEDURE:

A. The CEO will direct his assignee to review both the guidelines and forms/instructions for applicable federal and state agencies not less than annually including, but not limited to:

B. Federal Agencies:

1. IRS (Key web site: www.irs.gov)
    1. SS4 Application *for Employer Identification Number*
    2. Form 8821 Tax *Information Authorization*
    3. Form 2678 *Employer Appointment of Agent*
        a. Letter attachment for Form 2678
    4. W4 *Employee Withholding Allowance Certificate*.
    5. 940 *Employers Annual Federal Unemployment Tax Return.*
    6. Form 941, *Employer's QUARTERLY Federal Tax Return*
    7. Form 941c, *Supporting Statement to Correct Information*
    8. 26 U.S. Code § 3504
    9. IRS REG-137036-08
    10. IRS Pub. 15-A
    11. IRS Pub. 15, Circular E
    12. IRS Proc. 70-6
2. U.S. Citizenship and Immigration Services (Key web site: www.uscis.gov)

1. Form I-9 Employment *Eligibility Verification*.

3. U.S. Department of Labor, (Key web site: www.dol.gov)
    1. Rules, forms, and instructions relating to household employers and domestic service employees.
    2. Federal Fair Labor Standards
    3. Wage and hour rules.

C. Michigan Agencies

1. Michigan Department of Labor & Economic Growth (Key web site: www.michigan.gov/cis)
    1. UIA 1020 *Unemployment Insurance Agency Employers Quarterly Tax Report*, (Key web site: www.michigan.gov/uia)
    2. UIA 1019 *Unemployment Insurance Agency Amended Wage Detail Report*, (Key web site: www.michigan.gov/uia)
    3. UIA 1017 Wage Detail Report, (Key web site: www.michigan.gov/uia)
2. Michigan New Hires Operations Center, (Key web site: www.newhire-com/mi)
3. Michigan Department of Treasury, (www.michigan.gov/treasury)
    1. Form 518 *Registration for Michigan Taxes*
    2. Form 151 *Power of Attorney*
    3. Form 3683 *Payroll Service Provider Combined Power of Attorney*
    4. Form 163 *Notice of Change or Discontinuance*
    5. Form 160 *Combined Return for Michigan Taxes*
    6. Form 165 *Annual Return for Sales, Use and Withholding Taxes*
    7. Form MI W-4 *Michigan Employee Withholding Certificate*
4. Michigan Department of Motor Vehicles,
    1. Form BDVR – 154 *Record Look up Request* (Key web site: http://www.michigan.gov/documents/bdvr154_16269_7.pdf)
5. Michigan Department of Community Health, (Key web site: http://www.michigan.gov/documents/SelfDeterminationPolicy_70262_7.pdf) Self Determination Policies.

D. Wisconsin Agencies

1. Wisconsin Department of Revenue http://www.revenue.wi.gov/index.html.
    1. Form BTR-101 *Application for Business Tax Registration*
    2. Form A-222 *Power of Attorney*
    3. Form WT-7 *Employers Annual Reconciliation*
    4. Form WT-4 *Wisconsin Withholding Exemption Certificate*
    5. Form WT-5 *Wisconsin Earned Income Credit Advance Payment Certificate*. (If applicable)
    6. Form WT-6 *Withholding Deposit Report*
    7. All changes in address or other information are submitted via the following methods:
        - Submit address change through My Tax Account
        - Email: dorregistration@revenue.wi.gov
        - Write: Wisconsin Department of Revenue,
        - PO Box 8902, Madison, WI 53708-8902
        - Fax to: (608) 264-6884, ATTN: Registration Unit

2. Wisconsin Department of Workforce Development http://www.dwd.state.wi.us/default.htm.
    1. Form UCT 1-E *Wisconsin Employer Report*
    2. Form UCT-8291 *Employer Power of Attorney Assignment*
    3. Form UTC-101 *Quarterly Contribution Report*
    4. Form UTC-7842 *Contribution Adjustment Report*
    5. Filing and payment may be made online at http://unemployment.wisconsin.gov and

click on "File Tax and Wage Reports".

E. North Carolina Agencies
    1. North Carolina Department of Revenue
        1. GEN-58 *Power of Attorney*
        2. NC-AC *Business Address Correction*
        3. NC-5 *Withholding Return*
        4. NC-3 *Annual Withholding Reconciliation*
        5. NCUI 101 *Employers Quarterly Tax and Wage Report*
        6. NC-4 *Employee's Withholding Allowance Certificate*
    2. Employment Security Commission of North Carolina
        1. NC-BR *Business Registration Application for Income Tax Withholding*
        2. NCUI 604 *Employer Status Report*

F. Florida Agencies
    1. Florida Department of Revenue
        1. DR-1 *Florida Business Tax Application*
        2. DR-600 *Enrollment and Authorization for e-Services Program*
        3. DR-835 *Florida Department of Revenue Power of Attorney and Declaration of Representative*
        4. RTS-9 *Application for Agent Registration*
    2. Florida New Hire Reporting Center
        1. *Florida New Hire Reporting Form*
    3. Florida Department of Economic Opportunity
        1. RT-6 *Employer's Quarterly Report*

G. Colorado Agencies
    1. CR 0100AP Colorado Withholding Account Application
    2. DR 0145 Tax Information Designation and Power of Attorney for Representation

H. Maine Agencies
    1. Maine Revenue Services and Department of Labor Application for Tax Registration
    2. 1848-ME Power of Attorney and Declaration of Representative

I. Minnesota Agencies
    1. Minnesota Department of Revenue
        1. ABR *Application for Business Registration*
        2. REV 184 *Power of Attorney*
    2. Minnesota Department of Human Services
        1. Minnesota New Hire Reporting Center
    3. Minnesota Unemployment Insurance
        1. MN SUTA Registration

J. Illinois Agencies
    1. REG-1 Illinois Business Registration Application
    2. UI-1M Unemployment Insurance Special Mailing Form
    3. Department of Employment Security – Report to Determine Liability under the UIA
    4. IL-8655 Reporting Agent Electronic Services Authorization
    5. IL-4848 Power of Attorney

K. Missouri Agencies
    1. 2643A Missouri Tax Registration Application
    2. 2827 Power of Attorney
    3. Unemployment Tax Registration
    4. Division of Employment Security Power of Attorney

I. **PURPOSE:**
To refund FICA to household employees earning when applicable

II. APPLICATION:
The policies and procedures stated herein apply to all GT employees.

III. REFERENCE:

IV. DEFINITIONS:

V. **POLICY:**

Any direct hire employee of a FI EOR is to receive a refund of FICA taxes if they earn less than the federal requirement as stated in the IRS Publication Circular E for wages in a calendar year. A corresponding employer refund will be paid to the State of Vermont.

VI. PROCEDURES:

A. An adjustment is made in the accounting software for withheld Social Security and Medicare.
B. Year-end totals reflect gross pay with no FICA tax withheld.
C. Employee checks are printed for previously withheld FICA taxes by February 28th of the following year by the accounting department.
D. The billing department will apply employer credits as appropriate to the State.
E. Form 941-X and Schedule R are used for any quarters where the wages are adjusted.
F. Documentation of the employees' refunds and employer credits is forwarded to the file room for the files.
G. The Chief Financial Officer is responsible for assuring FICA refunds are processed timely and accurately and applied to the employer appropriately.

VII. REVIEW RESPONSIBILITY:
This policy and associated procedures shall be reviewed annually.

I. PURPOSE:

To establish policies and procedures to ensure access to services that provide a culturally competent atmosphere that allows for meaningful participation by the individual receiving services.

II. APPLICATION:

The policies and procedures stated herein apply to all GT Independence employees.

III. REFERENCE:

IV. DEFINITIONS:

Relay Services - Communication systems that allow hearing persons and Deaf, hard of hearing, or speech impaired persons accessibility to communicate, typically via a Teletypewriter (TTY).

V. POLICY:

A. GT Independence will provide interpretation services at the cost of the company when needed.
B. Staff who utilize interpretation services will do so in a cost effective and efficient manner.
C. GT Independence will provide alternate format written materials such as large print, Braille, and other languages upon request.
D. GT Independence will maintain a minimum of three Spanish bilingual Customer Service Associates.

VI. PROCEDURES:

A. Staff will collaborate with the referring agency on providing interpretation services.
B. If the client prefers, they may utilize a family member or person of their choice for interpretation.
    a. This is not recommended.
    b. Staff must have the person sign an Interpretation Waiver.
C. Use of interpretation services must be approved by authorized personnel. The following are the only individuals who can authorize interpretation services. Each will have an individual access code that will be kept confidential.
    a. Chief Executive Officer
    b. Chief Financial Officer
    c. Business Director
    d. Customer Service/Call Center Manager
    e. Field Service Managers
D. Voices for Health - MUST have approval.
    a. Phone Interpretation (Available nationally)
        i. If you receive a call from someone speaking another language, immediately record the phone number they are calling from and attempt to get their name.
            1. If the person stays on the line, make a conference call by:
                a. Pressing the *conferenc*e button. The person will be put on hold.
                b. Dial Voice for Health at 1-800-650-0310.
                c. Press the *conference* button to join the calls.
            2. If the person does not stay on the line, continue connecting to the interpretation service and give them the number to conference in.
        ii. Press 3 for the Phone Interpreting menu.
        iii. Press 2, an authorizer must be available to enter in the access code.
        iv. The following information is needed:
            1. Access Code
            2. Your name
            3. Your program/department
            4. Language needed (if you are unsure, assistance will be provided)
            5. Client name
            6. Client telephone number (if client is not on-site)
        v. Record the call serial number in the Call Log System.
        vi. Dispatcher will connect you to the interpreter and client, if not still on the line.

vii. If the call did not originate with a CSA, transfer to the appropriate CSA as soon as possible after connecting to the interpretation service to increase time and cost efficiency.
viii. This service may also be utilized when making an outgoing call to a participant or employee who is in need of an interpreter.

b. On-site Interpretation (MI only)
   i. Must be scheduled in advance, Spanish 48 hours, other languages minimum of 72 hours.
   ii. VFH will assist in determining if they can provide an on-site interpreter at an comparable cost to phone interpretation. If phone interpretation is determined to be more economical, it will used.
      1. Dial 1-800-650-0310.
      2. Press 2 to be transferred to a request coordinator.
      3. Provide the following:
         a. Your name
         b. Your business name and program/department/location
         c. Language needed
         d. Appointment date, time, expected duration, and location
         e. General purpose of the appointment
         f. Contact person at the appointment
         g. Client name
         h. Any special requests
      4. Record the assignment number on the participants paperwork.
   iii. Billing begins at the scheduled appointment time or earlier if services begin prior.
   iv. 12 hours notice is required for cancellation to avoid a 1 hour cancellation fee.
      1. Call 1-800-650-0310.
      2. Press 2 to be transferred to a request coordinator.
      3. Provide the assignment number to the request coordinator.
      4. Record the cancellation information on the GT Interpreter Authorization Form and send to the Executive Administrative Assistant, in case of any billing errors.
   v. Minimums
      1. Sign Language interpreting has a minimum 2 hour charge.
      2. Other language interpreting has a minimum 1 hour charge.

E. Other states needing in person interpretation services will be contracted in a cost efficient manner by field services.

F. Relay Services
   a. Relay Services are available in most states by calling 7-1-1. No approval is needed to utilize these services.
      i. Individuals may call 7-1-1 to gain access to relay services to call us.
      ii. We may call 7-1-1 to contact individuals with appropriate devices.
   b. If you get a call from a Relay Center, **DO NOT** hang up.
   c. See the attached information from each states' Relay Service for more information.

VII. REVIEWS RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

I. **PURPOSE:** To establish policies and procedures to ensure access to services that provide a culturally competent atmosphere that allows for meaningful participation by the individual receiving services.

II. **APPLICATION**: All programs of GT Independence as well as those under contract with GT Independence for the provision of services and supports.

III. REFERENCE:

A. Medicaid Chapter III.

V. DEFINITIONS:

CULTURAL COMPETENCE	An ongoing commitment to linguistic and cultural competence that ensures access and meaningful participation for all people in the service area. Such commitment includes acceptance and respect for the cultural values, beliefs and practices of the community, as well as the ability to apply an understanding of the relationships of language and culture to the delivery of supports and services.
LIMITED ENGLISH PROFICIENCY (LEP) SERVICES	An ongoing commitment to provide timely access to effective language services for persons who are unable to speak, read, write or understand English at a level that permits effective interaction with his/her service provider.

VI. POLICY:

A. A culturally competent atmosphere shall be conveyed to individuals seeking services in an easily understood manner at all times.
B. Individuals with limited English proficiency shall be provided timely access to effective language services.
C. Information pertaining to the availability of culturally sensitive and limited English proficiency services shall be posted and clearly accessible in a variety of mediums.
D. All services shall be provided in a culturally competent atmosphere and will demonstrate acceptance for the individual's cultural values, beliefs, practices, and language, as well as the ability to apply an understanding of the relationships to the delivery of supports and services.
E. GT Independence will evaluate the ethnic**,** cultural, and language needs of each of its area it serves on an annual basis.
F. GT Independence will address cultural competence as part of the hiring process for prospective candidates for employment.
G. Cultural diversity training and LEP training will be a part of new employee orientation with annual updates.

VII. PROCEDURE:

A. Customer Service will assure that all reception areas of GT Independence have information on culturally sensitive services available in a variety of mediums.
B. Customer Service will be informed of up-to-date community resources and will assist staff and individuals who request multicultural services to ensure that provision of service and support are appropriate
C. Customer Service will identify non-English languages that are likely to be encountered by reviewing:
   1. Census data,
   2. Consumer utilization data from consumer files,
   3. Data from community agencies and organizations.
D. Customer Service will also annually review all resources (points of contact) needed to provide effective language assistance to persons with limited English proficiency.
E. GT Independence will question prospective candidates for employment regarding cultural competence.
F. GT Independence will assist the consumer in identifying their cultural preference by directing them to the language poster hanging in the lobby, by helping them review the "I Speak" cards also available at all locations or through interviews with the consumer or his/her representative.

G. Upon the identification of the consumer's language preference, staff will contact Customer Service or one of the individuals from the Interpreter list found in the "I Speak" cards, to secure assistance and set a time for the Initial Intake/Assessment and future appointments, (at no cost to the consumer).
   1. If the consumer has requested a family member assist them, that individual may do so until a qualified professional can be secured, however a qualified professional must be in place no later than the third appointment.
   2. If the qualified professional is contracted from outside the agency, that individual/agency will sign and agree to all confidentiality requirements.

H. Customer Service will also provide, if necessary, the appropriate culturally sensitive assistance through the Grievance and Appeals process should the individual require help.

I. All personnel are expected to receive initial and annual training in Cultural Diversity.

VIII. Review Responsibility: This information shall be reviewed annually.

I. PURPOSE:
To state the Mission and Core Values which guide the activities of GT Independence.

II. APPLICATION:
The mission, values, policies and procedures stated herein apply to everyone associated with GT Independence including: GuardianTrac LLC; GT Financial Services; Michigan Agency with Choice LLC; GT Financial Services of Wisconsin LLC; Wisconsin Agency with Choice LLC; GT Financial Services of North Carolina LLC; North Carolina Agency with Choice LLC; and GT Independence of Florida.

III. REFERENCE:
NA

IV. DEFINITIONS:
NA

V. POLICY:

GT Independence's Mission:
To help people live a life of their own choosing regardless of age or ability.

Core Values:

The following items represent notions or doctrines that we as a company hold to be of paramount importance. We seek to communicate an understanding of, enthusiasm for, and eagerness to share these values:

We Believe in Self-Determination - We believe that everyone should be able to choose how they live their lives and with whom they associate. We believe that everyone should have the confidence to make their choices known. We believe that everyone should have the freedom to take risks.
We believe that people get the most from their in-home care when they can hire (and fire) the providers of their care. We believe in protecting the fundamental rights of everyone we serve, regardless of age or ability.

We Believe in Integrity - We confront difficult decisions with a desire to "do the right thing" above all. We embrace our responsibilities and never avoid them, both in our personal and professional activities. We strive to complete our duties, according to our pledge, with total transparency. We own our mistakes and collaborate to correct them. We will not tolerate the smallest degree of dishonesty in ourselves or our co-workers and we will fervently work to illuminate what we see as untrue.

We Believe in Community - We believe that regardless of an individual's age or ability, having friends and knowing people is the best way to promote safety and happiness. We believe that the individual and the community benefit most when everyone is included with equal rights and participation. We recognize as individuals and as a company, our success depends on support from our community and it is therefore in our interest to promote a strong local community. We believe that we have a duty to the members of our community to collaborate, to be helpful, to be compassionate and to be kind.

We Believe in Professionalism - We believe that to be effective, we must present our work and ourselves in an organized, neat, punctual and appropriate manner. We

believe that we must constantly achieve the highest standard of quality in our work. Each of us commits to collaboration, continuous improvement, responsiveness and flexibility in our work. We believe in respecting professional boundaries and protecting individuals' privacy. We believe in maintaining our service standard especially at times when we are confronted with stressful or difficult situations.

We Believe in Respect - We believe that we must listen carefully to our stakeholders and give their issues our full attention. We believe in crafting solutions to issues that reach a common goal and maintain everyone's dignity. We achieve this by addressing problems directly, calmly and honestly. We believe in working expediently and conserving our stakeholder's time. We believe that to truly collaborate we must put ourselves in our stakeholder's shoes.

We Believe in Excellence - We believe we must constantly question our methods in search of better ways to do our work. We believe in following through, refusing to accept poor work and asking for assistance when needed. We believe that we must be motivated to regularly exceed the expectations held by our stakeholders. We believe that each member of the company has responsibility for the company's success.

We value above all our ability to serve and support people in their community.

Review Responsibility: This information shall be reviewed annually.

I. PURPOSE: To obtain a sufficient training guideline for all GT Independence staff.

II. APPLICATION:

III. REFERENCE:

IV. DEFINITION:

V. POLICY:
It is the policy of GT Independence that all training activity is designed to provide quality services to consumers and to meet State and Federal requirements. To accomplish their assigned duties, all direct service staff, managers and team leaders must complete a minimum standard of training to assure that our consumers receive the best support and treatment in order to achieve their desired outcomes.

VI. PROCEDURES:
The following outlines the minimum GT Independence staff training requirements.

WHAT	WHO	WHEN – Initial	WHEN – Ongoing
1. Recipient Rights, Abuse, & Neglect	- All GT Independence staff	- Within 30days of hire	- Annual update
2. Mission & Values/Branding Guidelines	- All GT Independence staff	- Within 30days of hire	- Annual update
3. Code of Ethics	- All GT Independence staff	- Within 30days of hire	- Annual update
4. CMS Medicare Parts C & D Fraud, Waste, and Abuse Training and General Compliance Training	- All GT Independence staff	- Within 30days of hire	- Annual update
5. Cultural Diversity	- All GT Independence staff	- Within 30days of hire	- Annual update
6. Person-Centered Planning	- All direct service staff	- Within 60days of hire facilitator and 120 days for others thereafter for all	- Annual update
7. First Aid & CPR & Bloodborne Pathogens **NOTE** Staff who work with infants or	- All direct care staff - Other individuals, as designated	- Current certificate prior to working with persons served	- As per certificate

children must receive specific CPR training to infants & children			
8. HIPAA	- All GT Independence staff	- Within 30days of hire	- Annual Update
9. Limited English Proficiency (LEP)	- All GT Independence staff	- Within 30days of hire	Annual Update
10. Adult/Child Protection	- All direct service staff	- Within 30days of hire	- N/A
11. Other *-Mandt* *-Gentle Teaching* *-Medication Management* *-Vehicle Training* *-Management Training* *-Vulnerable Adult* *-Incident Reporting* *-Bloodborne Pathogens - DC*	- As designated depending on need or per contracted agency requirement	- As required	- As required
12. Departmental Training	- Customer Service - Payroll - Billing	- All new employees will participate in a departmental training program within the first 30 days of employment	- As required
13. Identification of Unsafe Environmental Factors and Reducing Physical Risks	- All GT Independence staff	- Within 30days of hire	- Annual Update

GT Independence will:

A. Maintain procedures to outline the process for carrying out the required training.
B. Make continuing education available to all staff in response to training needs and advancement within the company.
C. Monitor providers and verify that providers' staff has the required trainings.
D. Assess and identify any other training that may be needed beyond the required trainings.
E. Review required trainings annually as part of the compliance and quality improvement process.

VII. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.

I. PURPOSE: To establish policies and procedures to ensure effective tracking of communications/ complaints.

II. APPLICATION: All programs operated directly or under contract with managed care organizations or other State Agencies

III. REFERENCE: Service Contracts between GT and state Medicaid programs; service contracts between GT and managed care organizations

IV. DEFINITIONS:
Communication Log Software: The electronic database employed by GT Independence to track all incoming customer service communications. Each communication received by customer service staff is documented electronically and maintained in our servers for ten years.
Escalated Communication: Any communication where the caller asks to speak with someone above the front line staff level.

V. POLICY:
A. The company will at all times endeavor to provide the highest possible level of customer service.
B. Matters necessitating escalation will be escalated according to the procedure in policy 1-11, Consumer Grievances.
C. All incoming customer service communications will be documented in the company communication log software.
D. All communications received will be responded to within the designated guidelines.
1. Calls and voicemails in no more than 24 business hours.
2. E-mails, faxes, and letters will be responded to within 24 hours whenever possible but no later than 2 business days.
E. Call data will be tracked daily and reviewed on a regular basis by the customer service department.
F. Open communications will be reviewed regularly and escalated appropriately.
G. Issues/complaints will be tracked and analyzed for quality improvement.

VI. PROCEDURE:
A. Customer Service Associates maintain a register containing the following data elements:
1. Date and time of the communication
2. Name and title of persons/entities placing and receiving communication
3. Subject of issue/complaint raised
4. Narrative of issue/complaint
5. Status of issue/complaint.
6. Corrective action taken/resolution and date.
7. Escalation status
8. Date the participant's support coordinator was notified, if required.
B. Call data will be tracked by the following and monitored by the Customer Service Manager.
1. Total Incoming
2. Answered
3. Abandoned
4. Voicemail
5. Open Issues
C. Call logs are reviewed by Customer Service Team Leaders and Manager weekly to identify issues and procedure inefficiencies, including open communications.
D. Issues and procedures inefficiencies will be reviewed and discussed at the Weekly Team Leader meeting and/or Department Head meeting, as appropriate.
E. Quarterly, the Quality Improvement Department will mail all escalated callers an opportunity to provide feedback regarding their customer service experience and make recommendations annually to the Quality Improvement Team and Executive Committee based on the results. This will begin in 2014.

F. An annual analysis of escalated communications is done by Customer Service and Quality Improvement. The results and performance improvements are presented to the Quality Management Team. The first set of results will be analyzed for 2014 and a plan developed for 2015.

G. Customer Service staff provide a daily report that includes an account of emails, documents received from the post office and faxes which require processing.

VII. REVIEW RESPONSIBILITY:

This policy and associated procedures shall be reviewed annually.