

CDASS FINANCIAL MANAGEMENT SERVICES

Frequently Asked Questions March 2021

Financial Management Services Information

1. What changes have taken place in regards to the CDASS program?

Effective April 1st 2021, the Financial Management Service (FMS) providers that participants can choose from has changed. CDASS participants still have the ability to choose which approved Financial Management Service (FMS) provider from the current vendors they would like to use.

2. What are the main roles of an FMS provider?

The FMS provider you choose will be responsible for establishing the Member or Authorized Representative as the legal Employer of Record. They will also,

- Assist with obtaining a Federal Employer Identification Number (FEIN)
- Process Attendant paperwork, timesheets and issue paychecks
- File employer related taxes
- Issue W-2s
- Obtain Workers Compensation Insurance coverage
- CDASS budget expenditure monitoring

FMS Provider Selection

1. Who are the approved FMS providers I can choose from?

CDASS Members can chose between these FMS providers:

Palco

Toll Free Phone: 866-710-0456 and select the option for Colorado

Website: www.palcofirst.com/colorado/

Email: CO-CDASS@palcofirst.com

Public Partnerships (PPL)

Toll Free Phone: 888-752-8250

Website: www.publicpartnerships.com/state-programs/colorado/

Email: ppcdass@pcgus.com

2. As a Member, do I get to change FMS providers? If so, how often?

Open enrollment occurs quarterly. The table below illustrates open enrollment dates and paperwork deadlines for changing providers. Paperwork received after the deadline will delay the transition to the following quarter. For more information, see [Changing FMS Providers - Process Flow](#) resource located at: <https://consumerdirectco.com/cdass-resources/>

Paperwork Due:	Start Date with new FMS:
March 1st	March 16th
June 1st	June 16th
Sept. 1st	Sept. 16th
Dec 1st	Dec 16th

3. What are the pros and cons of each vendor and what separates them from one another?

Each FMS vendor is available to answer any questions you have about their organization. FMS vendor contact information can be found above and in Chapter 5 of the CDASS Training Manual. The chapter contains marketing materials as well as a comparison chart of the providers. To request a copy of the most updated manual, please contact Consumer Direct Care Network Colorado at 844-381-4433 or infocdco@consumerdirectcare.com.

4. If I change FMS providers, do my Attendants need to complete new employment applications?

Each FMS provider has their own paperwork you will be responsible for completing in order to transition to the new provider. Your Attendants may also need to complete new forms specific to that FMS. Contact the FMS directly to learn of their requirements and paperwork needs.

FMS Procedures

1. Can an FMS provider refuse to work with or terminate a Member? If so, under what circumstances?

No, the FMS provider cannot refuse to work with a Member. The only circumstances under which the FMS can terminate the Member is if the Member is terminated from CDASS by the Case Management Agency in accordance with 10 CCR 2505-10 Sections 8.510.12 and 8.510.13.

2. What liability does a Member have when being an employer?

Members face the same liabilities that any other employer will face. Details can be found on the IRS website at www.irs.gov.

3. Do the FMS providers get paid the same and what impact will it have on the portion of my allocation available to purchase Attendant services?

The FMS providers are paid a Per Member Per Month (PMPM) established by the Department of Health Care Policy and Financing. The PMPM is separate from the Member's allocation and does not affect the available funds for Attendant services. Below are the rates:

	Palco	Public Partnerships (PPL)
Financial Management Service	\$85.00/PMPM	\$103.21/PMPM

FMS and Consumer Direct Support

1. Can CDASS Members go to their FMS provider or Consumer Direct to help them locate new Attendants? What supports are available for this?

Consumer Direct manages the [CDASS Attendant Directory](#) as a tool to connect Members in need with available Attendants. Consumer Direct is available as a resource and to answer any questions Members may have on being an employer. It is ultimately the Member or Authorized Representative's responsibility to staff all Attendant needs including backup care.

CDASS Attendant Directory link: <https://directory.consumerdirectco.com/>

2. How do I get a Federal Employer ID Number (FEIN) required in Fiscal/Employer Agent?

The FMS vendor will assist a Member or Authorized Representative in obtaining the FEIN. The Member or Authorized Representative does not need to contact the IRS themselves for this.

3. Who can hold the FEIN, the Member or the AR?

It is best practice and highly recommended that the person who is managing the CDASS services hold the FEIN.

4. Who is responsible for hiring, dismissing, supervising, and training Attendants?

Under the F/EA model, the Member or Authorized Representative is the legal Employer of Record and is responsible for all aspects of being an employer including hiring, dismissing, supervising, and training Attendants.

5. Does the Member need to purchase employer liability insurance?

No. The FMS will carry the liability insurance.

6. Does everyone have to be paid overtime and how does it work if an Attendant works more than 40 hours for more than one Member?

If an Attendant works more than 40 hours in a work week or more than 12 hours in a single shift for the same employer, they are most likely required to receive overtime compensation as indicated by the Fair Labor Standards Act (FLSA).

There are some instances where an individual may be exempt from overtime such as family members as Attendants. For more information, please visit

<https://www.dol.gov/whd/homecare/>

7. My current Attendants work more than 40 hours each week, I'm concerned how I will afford overtime with my current allocation. What options are available to me?

The requirement to pay overtime is a federal requirement and cannot be waived. There are options available to Members in this situation:

1. Consider the option of hiring additional Attendants to reduce the hours worked by Attendants to fewer than 40 hours. Consumer Direct can assist you with resources for finding additional Attendants.
2. Evaluate the wage paid for services to determine if a lower hourly wage is necessary to account for the overtime payment.
3. Contact your Case Manager to explore other service delivery options that may better fit your needs.

8. The current wage limit is \$45.09 per hour. Can the compensation for overtime exceed this amount?

Yes. The wage limit can be exceeded only for overtime compensation.

Please speak with your FMS provider and Case Manager regarding your need to pay overtime compensation.

Please see the FLSA Guidance Sheet located on the Consumer Direct website for more information on the Fair Labor Standards Act and your role as a CDASS employer.

<https://consumerdirectco.com/cdass-resources/>

9. How can I contact Consumer Direct Colorado if I have more questions?

Phone: 844-381-4433

Email: infocdco@consumerdirectcare.com

Fax: 866-924-9072

Website: www.consumerdirectco.com