

Department of Disabilities, Aging and Independent Living (DAIL) Conflict-Free Case Management Implementation Update May 2025

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Purpose of Conflict-of Interest

Protect the right of individuals engaged in Home- and Community-Based Services

Achieve compliance with [Federal Regulation : 42 CFR § 441.730\(b\)](#)

Potential Areas of Conflict in the Current Systems:

Intake

- Agency that will provide direct service could say that developmental services are not the right match for people who could be hard to support.

Eligibility

- Direct service provider could find people who will be easiest to support or most profitable eligible for services.

Needs Assessment

- Direct service provider could say that needs are higher to be able to provide extra services.

Funding Proposal

- Direct service providers determines what the costs are to provide service. There are not standardized rates for the same services across the state.

Case Management

- Direct service providers helping the individual choose services could suggest what they have available not necessary what someone wants or feels would best meet their needs.

Conflict Free Case Management: Choices for Care (CFC)

Starting in mid-2024, the five current Area Agencies on Aging (AAAs) began to provide case management for all CFC participants.

How many individuals are impacted?

- Between June 2024 and June 2025, 1,260 individuals who received home health case management will transition to AAAs for case management services. 90% of transitions these initial transitions are complete.
- Between October 2025 and December 2025, approximately 500 CFC participants who live in Adult Family Care (AFC), and individuals in Flexible Choices will transition to the AAAs for case management.

How is Vermont supporting the transition process?

- Transition planning
- Provider forums
- Provider training

Conflict-Free Case Management: Brain Injury and Developmental Disabilities Systems

Vermont has executed two statewide contracts to deliver case management for the Brain Injury and Developmental Disabilities Services systems.



How did Vermont do this?

- The State put out a Request for Proposals (RFP) for different organizations to apply.
- The State decided which case management organizations (CMOs) will work best for people who receive Developmental Services and gave those organizations contracts.
- Based on who applied, the Department choose two organizations to provide case management for people in Vermont. This means that people have a choice of which agency will provide case management for them.
- Current providers of DS will continue to deliver home and community-based services (HCBS), except for case management.

Community Engagement and Outreach Efforts

- Community Engagement Meetings
 - DAIL offered community forums to explain the Conflict-of-Interest and Payment Reform initiatives
 - Provided 14 in-person meetings around the State
 - 1 virtual session was held
 - Individual Provider Agencies hosted opportunities for DAIL to discuss changes
- Case Management Organizations (CMO) “Meet and Greet” Opportunities
 - DAIL hosted 12 events to meet Benchmark Human Services and the Columbus Organization
 - 8 in-person events were held around Vermont
 - 4 virtual events were offered
- Voices and Choices Conference
 - Both CMOs had a booth at the annual conference sponsored by Green Mountain Self-Advocates
- Provider Introductory Meetings
 - Established initial opportunities for Designated Agencies and Specialized Service Agencies to meet Case Management Organizations and Vermont State Directors

Completed Community Meetings Locations

Community Engagement Sessions (COI/Payment Reform)	CMO Meet and Greet Opportunities
Burlington	Burlington
Burlington	Burlington
Waterbury	Waterbury
St. Johnsbury	St. Johnsbury
St. Johnsbury	
St. Albans	
St. Albans	
Bennington	
Bennington	Bennington
Rutland	Rutland
Rutland	Brattleboro
Hartford/White River Jct.	Hartford/White River Jct.
Hartford/White River Jct.	

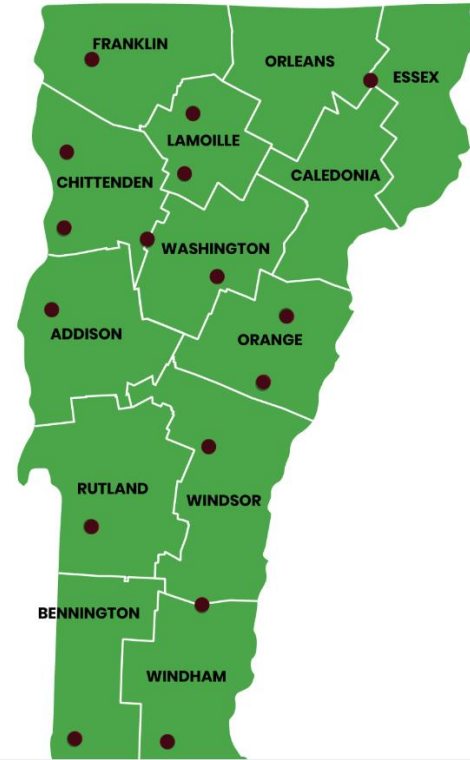
Transition Planning

All entities within the system were provided grant funding to support efforts related to the transition period

CMOs were provided start-up funding

Designated Agencies (DA) and Specialized Service Agencies (SSA) were offered grant funding related to the number of individuals supported

Allowable uses for transition funding include advertising/recruiting, staffing, overtime, direct service provider staff retention bonuses, records transfer, etc.



Designated Agencies

Counseling Services of Addison County
Health Care and Rehabilitation Service
Howard Center
Lamoille Mental Health Services
Northeast Kingdom Human Services
Northwest Counseling and Support Services
Rutland Mental Health Services
United Counseling Services
Upper Valley Services
Washington County Mental Health

Specialized Service Agencies

Champlain Community Services
Families First of Southern Vermont
Green Mountain Support Services
Lincoln Street Inc.
Specialized Community Care

Brain Injury Providers (Brain Injury Only)

Pride Brain Injury, Inc.
Choice Support Services

Case Management Organizations

Benchmark Human Services
The Columbus Organization



DEPT. OF DISABILITIES, AGING & INDEPENDENT LIVING

Transition Meeting Expectations



Meet and Greet

Introduction to new Case Management staff



Information Sharing

Opportunity for new Case Management staff to learn about you. Answer any questions you may have about the transition

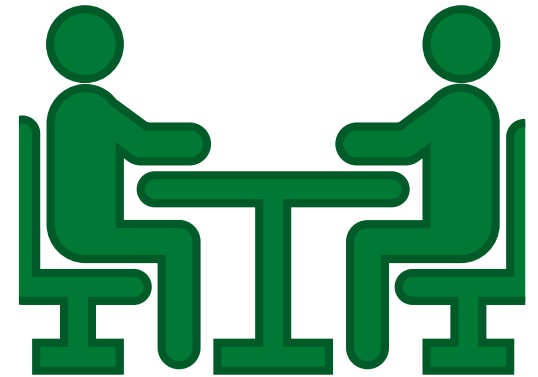


Collaboration

Develop cooperation between current Service Coordinator/Case Manager and new Case Management staff to make the transition as smooth as possible

Case Management Organization Recruitment Update

- CMOs have begun hiring Vermont dedicated staff, including State Directors, Case Manager Supervisors, and Case Managers.
- Case management staffing needs will not be known until enrollment period has ended
 - CMOs need full information based on total census and geographic breakdown.
- Early efforts have yielded success in attracting staff
 - Due to the aggressive implementation timeline, both Case Management Organizations have been advertising for open positions since early Spring 2025
 - CMOs report high response rates to advertisements on recruitment sites such as Indeed
 - Neither express concerns related to filling necessary positions nor meeting required caseload ratios



Home- and Community-Based Services Staff Retention Efforts

- Strong system commitment to maintaining Developmental Disabilities Services service/program coordinator and Brain Injury Provider case manager position
 - Separation of case management roles, responsibilities
 - Evolution of position duties to focus on oversight of direct services and other responsibilities
- Transition Grant funding to provide retention bonuses for staff at:
 - Designated /Specialized Service Agencies/Brain Injury Providers
 - Home Health Agencies
 - Area Agencies on Aging
 - Transition II
- Existing staff may be identifying best fit within Home- and Community-Based Service system
 - As staff determine the role that best suits their skill set, increases likelihood of job satisfaction and morale
 - Leads to increased overall retention rates within system
- **Development** of a sustained training module related to Home- and Community-Based Services topics
 - With and by Department staff and contractor
 - Initial implementation phase focus on case management
 - Access extended to larger Home- and Community-Based Services system with ability to add subsequent training

Vermont's Corrective Action Plan Steps

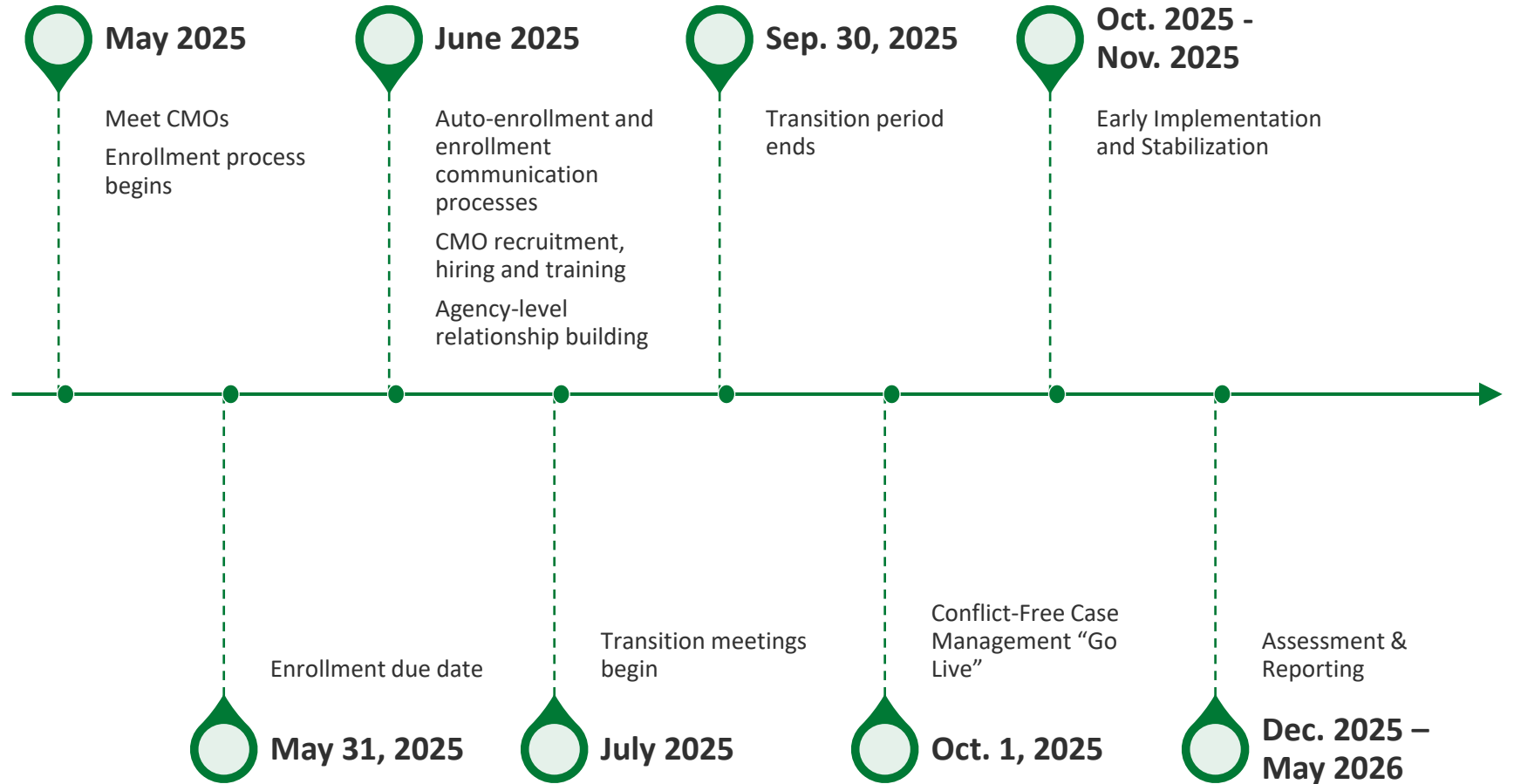


Major milestones:

- **Developed a HCBS-COI Advisory Committee:** Feb 2023
- **Completed a HCBS System Assessment:** May 2023
- **Determined HCBS-COI Structural Options:** August 2023
- **Released Draft Recommendations Public Comment:** December 2023-January 2024
- **Developed and released Request for Information (RFI):** May 2024
- **Developed and related Request for Proposals (RFP) :** September 2024
- **Choose organizations to provide Conflict-Free Case Management and developed contracts:** January-April 2025
- **Determined an organization to provide statewide, centralized Intake/Eligibility/Referral Organization and developed a contract:** January-April 2025
- **Transition Planning:** April-May 2025
- **Transition Period:** June-September 2025
- **“Go-Live” Date:** October 1, 2025



Current Timeline



Thank you!