

Financial Executor Portal Q & A

The Financial Executor is a state-contracted entity responsible for administering funds to Accountable Communities of Health (ACHs), partnering providers and other partners throughout the Medicaid Transformation Project. The state has contracted with Public Consulting Group (PCG) to act as the Financial Executor (FE). PCG will provide accounting and banking management support for DSRIP incentive dollars, distribute earned funds through the Financial Executor Portal (FE Portal), submit fund distribution reports to the state, and develop and distribute budget forms to participating providers for receipt of incentive funds.

On December 5, 2017, the ACHs participated in a webinar that explained how to use the FE Portal. The slides from the webinar can be found on the <u>Healthier Washington website</u>.

General questions

1. Where can ACHs send questions regarding the FE Portal, contracts, audit or technical issues?

Once the FE Portal is live, ACHs may email the <u>PCG help desk</u> or call 1-844-300-5040 for FE Portal related troubleshooting or other technical questions. For all other questions, including questions about contracts, auditing, or financial, ACHs should email <u>Savannah</u> Parker or Kayla Hammer.

2. What is the Independent Assessor's role in the FE Portal?

The Independent Assessor does not have a role in the FE Portal.

Partnering Provider/partner registration

3. After the initial batch upload on December 15, 2017, when is the next opportunity for ACHs to add providers to the FE Portal?

Once the FE Portal is live, ACHs may add providers at any time throughout the course of the demonstration. ACHs may add providers individually, or send a list of providers to be uploaded to the FE Portal for additional batch uploads. Batch uploads will occur on the 15 of each month through June 15. Batch uploads, using the same template as the December 15 deliverable, can be emailed to the Medicaid Transformation inbox. Please copy Savannah Parker and Kayla Hammer.

4. What happens after providers are uploaded to the FE Portal?

After providers are entered into the FE Portal, PCG will conduct an IRS match to confirm that provider information is correct. PCG will notify ACHs if there is an issue with the matching process. Providers will then receive an automated email containing information about how to register themselves in the FE Portal. Providers will then execute a Standard Partnership Agreement, which completes the registration process.

5. Will there be a notification to the ACHs to approve the providers in the FE Portal?

Yes. After the provider/partner completes registration in the FE Portal, an email will be sent to the ACH administrative users notifying them that the provider/partner has completed the registration process. ACHs may approve providers/partners at that time.

6. Are there any costs to providers/partners to being registered in the FE Portal?

There are no costs to providers or ACHs associated with being registered in the FE Portal.

7. If a provider/partner registers for the FE Portal, but ultimately decides not to participate in DSRIP project activities, can they be removed?

The provider/partner account can be deactivated. The ACH has the ability to manage this process in the FE Portal. It is recommended that ACHs deactivate non-participating providers from the FE Portal prior to funds distribution by the ACH.

8. How does a provider/partner with multiple EINs and multiple locations register in the FE Portal?

Should a provider/partner have multiple EINs (i.e. a different EIN for each location), the provider/partner must be registered with each EIN the ACHs anticipates issuing payment.

9. What if a provider/partner is participating in multiple projects in multiple regions? Will the provider/partner need to register with each specific ACH?

ACHs will initiate the provider/partner's enrollment. The provider/partner will only register once in the FE Portal, and each ACH would approve that provider/partner in their respective region. Payment to the providers/partners would come from the FE.

10. Are counties and tribes paid via the FE Portal?

Tribes and counties may be paid through the FE Portal as participating partnering providers. Counties should be registered as a non-traditional provider, and tribes have their own designation in the FE Portal.

Funds Flow

11. Do ACHs need to submit banking information into the FE Portal?

Each ACH will need to register as a partnering provider within their region in order to receive payment. After incentive funds are earned, they will be distributed to the Portal. ACHs can then direct payments to providers or themselves.

12. Will the ACH receive the full Year 1 amount in one lump sum?

ACHs will receive all earned DY 1 funds through the FE Portal in one lump sum. Earned funds in DY 2-5 will be distributed semi-annually, aligned with P4R and P4P measurement cycles.

13. Are ACHs accountable to the budget amounts by category as submitted in project plans? If not, is there a point in time where these categories and amounts are considered "locked in" or will there always be flexibility?

The budget amounts are, and will always be, flexible during the course of the Medicaid Transformation project. It is up to the ACH on how they wish to spend the funds once they earn it.

14. What happens to interest earned from the funds held by the FE?

All payments held by the FE are required to be in non-interest bearing accounts. There is no interest earned in any of the accounts held by the FE.

Reporting and auditing

15. What is the legal/fiduciary responsibility of the ACH for funds that pass by, but not through, the ACH in the FE Portal? If an ACH is audited, do they need to know how a provider spent earned dollars?

ACHs will need to track how partnering providers earned the incentives according to the specific region's approach to funds flow. However, ACHs are not required by the state to manage how the money is spent by providers/partners. ACHs may elect to work with providers/partners to capture provider/partner-level spending of incentive dollars.

16. How should ACHs report on administrative funds and Domain 1 investments?

To the extent possible, HCA encourages ACHs to add partnering providers and/or vendors to the FE Portal to distribute administrative funds and Domain 1 investments. The distribution of these payments will be recorded in the FE Portal by use category. Similarly, ACHs may pay themselves for administrative or Domain 1 costs, and should be designated as such by use category (i.e. project management and administrative costs, health systems and capacity building). HCA will be tracking and monitoring all funds that the ACHs are drawing for their own spending purposes.

17. Will ACHs need any additional detail or reporting other than what is already outlined in the FE Portal and Project Plans?

HCA encourages ACHs to keep detailed records of their budget and funds flow to partnering providers in preparation for implementation plans and semi-annual reports. It is likely that ACHs will be asked for further detail regarding how ACHs are investing incentive dollars. Further guidance will be issued as implementation plan and semi-annual reporting templates are developed.

18. Who is considered the payer on the 1099 form?

The FE will be considered the payer on the 1099 form, there will be a memo that identifies the payment was made by the specific ACH.

19. If a provider has multiple EINs, will the provider receive one 1099 form?

The 1099 forms will be sent to providers based on how the providers were paid in the FE Portal. If the provider has multiple EINs registered and receiving payments via the FE Portal, each EIN will receive a 1099 form. If a provider receives payments from multiple ACHs to the same EIN, the incentives will be broken down by ACH on the 1099 form associated with that EIN.

Contracts, MOUs, and Standard Partnership Agreements

20. Will ACHs enter into a contract with the Financial Executor?

The Financial Executor is drafting an agreement to be executed between PCG and each ACH that describes the role of the Financial Executor and the flow of funds. The PCG legal team is working on drafting this agreement and it will be shared with each ACH for review and feedback.

21. Are ACHs required to have a Memorandum of Understanding (MOU) with partnering providers registered in the FE Portal?

No. ACHs may have MOUs or other individual agreements with partnering providers in their region, but it is not required. However, ACHs and partnering providers must execute a Standard Partnership Agreement in the FE Portal; this is a requirement.

22. Is the Standard Partnership Agreement a two-party agreement between the partnering provider and the ACH? Is the agreement committing to payment?

The Standard Partnership Agreement is a two-party agreement between the ACH and partnering provider. The agreement does not contain language that commits the ACH to payment. The agreement contains boilerplate language that defines DSRIP and states the relationship between the ACH and partnering provider.

ACH users and roles

23. What is the procedure for changing the roles of ACH users (e.g. changing an administrative user to an editor)?

ACHs can request to change the user roles by emailing Savannah Parker or Kayla Hammer.

24. Why do providers need to be associated with projects in the FE Portal?

From a reporting standpoint, project association in the FE Portal helps HCA identify which projects providers are actively contributing to in the ACH region.

25. What happens if a provider adds or drops a project? Does an ACH need to update that?

If a provider is no longer involved with a project, the ACHs may edit that in the FE Portal. ACHs may still pay a partnering provider based on use category. Provider information is not related to how the payment is distributed.

26. In the FE Portal, what do ACHs select for themselves under the participating projects?

ACHs would identify themselves as administrative in the use category.