



**APD'S iCONNECT  
CONTRACT WARRANTS  
CLOSER SCRUTINY**

**DECEMBER 20, 2022**

## Dear Fellow Taxpayer

Florida has a well-documented history of poorly executed, large-scale, technology-related projects, which should give taxpayers cause for concern. Modernizing systems with new technology can enhance the ease and efficiency by which the government delivers goods and services to taxpayers when properly administered.

As the eyes and ears of Florida taxpayers, Florida TaxWatch has recently reviewed several procurement projects, including CONNECT, SLERS-2, and the Agency for Health Care Administration's Enterprise Data Warehouse, with a commitment to focus on the best outcomes for taxpayers. To add to this series, Florida TaxWatch has reviewed a technology project called iConnect, conducted by the Agency for Persons with Disabilities (APD).

APD operates iBudget Florida, a program that distributes home and community-based services waivers to persons with intellectual and developmental disabilities. To support the program, the APD procured a centralized, client data management system that could be shared by all stakeholders and provide safeguards against fraud. The system, known as iConnect, had the potential to enhance the delivery of services to a particularly vulnerable population.

iConnect has had an active contract since 2015. This contract has undergone one renewal and three extensions. The timing of this report is critical given that the current iConnect contract extension is scheduled to expire on December 31, 2022. Due to this impending expiration, Florida TaxWatch believes the project deserves greater scrutiny.

Florida TaxWatch is pleased to present this report and its findings to demonstrate concerns with the iConnect contract and to share recommendations as it remains active. iConnect is one of many examples illustrating the need to overhaul Florida's procurement system, and Florida TaxWatch looks forward to engaging policymakers regarding this need during the upcoming legislative session and beyond.

Sincerely,

A handwritten signature in blue ink that reads "Dominic M. Calabro". The signature is written in a cursive, flowing style.

Dominic M. Calabro

President & CEO

# Contents

<b>Dear Fellow Taxpayer .....</b>	<b>2</b>
<b>Executive Summary.....</b>	<b>i</b>
<b>Introduction.....</b>	<b>1</b>
<b>iConnect Procurement .....</b>	<b>2</b>
Business Case.....	2
Invitation to Negotiate .....	4
Original Contract and Amendments .....	5
Current Standing of Contract.....	6
Audits.....	6
<b>Florida TaxWatch Findings .....</b>	<b>7</b>
The iConnect Timeline Exceeds Statutory Allowance.....	7
Deliverables are Still Unmet .....	8
The Absence of a Claims Module Creates an Inconsistency with Contract and Law.....	9
Limited Interface Capabilities .....	9
Onboarding Requires Greater Support.....	10
<b>Conclusions.....</b>	<b>11</b>
<b>Recommendations .....</b>	<b>11</b>
<b>Appendix: Stakeholder Interviews .....</b>	<b>13</b>
APD .....	14
Clients .....	15
Providers.....	16
Waiver Support Coordinators (WSCs).....	20

## Executive Summary

The Agency for Persons with Disabilities (APD) is responsible for iBudget Florida (iBudget). iBudget provides home and community-based services (HCBS) through a federally approved Medicaid waiver to Floridians with intellectual and developmental disabilities (I/DD). Waiver Support Coordinators (WSCs) and service providers work with the APD clients to ensure they are receiving the services they need.

To enhance recordkeeping, increase security, and maintain compliance with the expectations of the Centers for Medicaid and Medicare Services (CMS), the APD pursued a procurement contract to develop a client data management system with capabilities to perform electronic visit verification (EVV), a safeguard against fraud. After an Invitation to Negotiate (ITN), the procurement contract was awarded to Harmony Information Systems, Inc. (which was later acquired by Mediware Information Systems and then by Wellsky, Inc.), and the resulting product is a software system known as iConnect.

The iConnect contract was a standard two-party agreement by statute, set to be active February 1, 2015 through June 30, 2018. Based upon negotiations, the deliverables were expected to be met by the end of the original term, and a renewal was expected to operate and maintain the system. The total cost was expected to be \$7.4 million and the contract established a cost cap of \$9.6 million.

During the timeframe that iConnect has been implemented, the APD has undergone two operational audits by the Auditor General. Both the first audit (performed in 2017) and the second audit (performed in 2021) found that the APD neglected to conduct required contract monitoring activities. As one of the APD's largest contracts, the execution of iConnect without required contract monitoring activities should concern Florida taxpayers.

Upon reviewing the procurement and contract of iConnect, as well as relevant materials within the APD's long-range program plans and legislative budget requests, Florida TaxWatch found several aspects of iConnect in need of greater scrutiny. Most in need of attention is the prolonged duration of the iConnect contract. Florida statute only allows one extension of a procurement contract, but iConnect has been extended three times. While the latest extension expires at the end of December 2022, the latest implementation plan suggests that the project will not end until April 2024.

Although the vendor's proposal suggested that all deliverables would be met before the first renewal, the APD still awaits the fulfillment of seven deliverables. Most of the deliverables are related to the deployment of a consumer portal, allowing APD clients and their caregivers access to their records. This is an especially important feature for empowering APD clients and providing a sense of self-determination.

In September 2022, the APD dropped one of the deliverables of the iConnect project. Originally, iConnect was intended to provide a claims module to process the billing of iBudget services. Although dropping this deliverable was deemed to be in the best interest of the project—the service providers already use a billing platform that works—proper procedures should be maintained. The APD should amend its contract with the vendor, and the Florida Legislature should amend § 393.066, Fla. Stat. (2020), which requires service providers to use iConnect for billing.

iConnect was not only intended to benefit the APD but also to enhance the recordkeeping of service providers and WSCs. For it to do so, it should have interface capabilities with secondary data systems

maintained by each party. Within its best and final offer, the vendor stated that it would create interfacing with such systems, specifically listing the software provided by Therap Services, LLC (Therap) as an example. The intention to interface with Therap was reiterated upon renewal of the contract; however, to date, there have been no developments for deploying an update to make such an interface possible.

As iConnect continues to be implemented, the onboarding of service providers and WSCs deserve special attention. As parties using the software daily, and liable for recoupments upon misuse or error, the functionality of iConnect is especially important. Required training is time consuming and is often delivered several months before users begin using the system, which limits the training's effectiveness. Currently, WSCs and service providers face difficulties accessing their portal, uploading documents, maintaining records, and participating in EVV. Help desk support is largely inaccessible and ineffective as personnel that staff the help desk often do not appear to possess the expertise necessary to effectively solve user problems. When WSCs and service providers cannot resolve their difficulties, they may be unable to provide the proof of service needed to pass their quality assurance reviews conducted by Qlarant.

The iConnect procurement is the latest of many IT projects that demonstrate the need to overhaul Florida's procurement system. In regard to this procurement process, the iConnect project highlights the need for better contract monitoring. **APD should revise its internal contract management processes to hold vendors accountable for the timely provision of contract deliverables and to comply with chapter 287, Florida Statutes.** Compliance with chapter 287 is particularly important given that the iConnect contract is scheduled to expire on December 31, 2022 (reference Amendment 8).

Similarly, agencies **should provide consistent documentation when establishing new deliverables and project schedules.** Throughout the conduct of the iConnect contract, amendments were often posted late. When the timeline was altered, some deliverables failed to be accompanied by new delivery dates.

When a contract is changed, such as was done with the abandoned claims module, an agency **should create an amendment when foregoing a provision of the contract.** Since the APD's claims module was listed as a requirement not only in the contract but also within Florida statute, **the Florida Legislature should amend Florida Statute 393.066 to eliminate the requirement of a claims module.** As it reviews Florida Statute 393.066, **the Florida Legislature should also consider adding language that allows providers to provide data to the iConnect system electronically and require APD to finalize implementation of the required interface.**

Since iConnect is a recordkeeping system for a network of stakeholders and not solely the Agency, the **APD should ensure the needs of stakeholders are met.** To do so, **the APD should provide alternative procedures when technical issues occur within the presence of a client and host a debrief with stakeholders and enhance supports for stakeholders.** To determine the potential value of conducting a debrief, Florida TaxWatch interviewed WSCs and service providers (Appendix: Stakeholder Interviews). Florida TaxWatch looks forward to engaging with the APD and supporting their efforts to improve iConnect.

## Introduction

The Agency for Persons with Disabilities (APD) is responsible for iBudget Florida (iBudget). iBudget distributes home and community-based services (HCBS) waivers to persons with developmental disabilities, enabling the persons to receive supports and services within home or home-like settings. HCBS waivers provide access to numerous supports and services, ranging from life skills development trainings to occupational therapy, making them invaluable to persons with developmental disabilities and their primary caregivers.

*“The purpose of the iBudget Waiver Program is to maintain and promote the health and functioning of individuals diagnosed with a developmental disability and to prevent, hospitalization or institutionalization. The goal of the program is to enable recipients to choose and receive services in their home or in their community.”*

– Agency for Health Care Administration<sup>1</sup>

HCBS waiver services distributed through iBudget provide APD clients with a set amount of money to spend upon the specific services they need. HCBS waiver services are funded through Medicaid, enabling the state to receive a federal matching contribution for each dollar spent. For FY 2021-22, the federal match totaled \$1.1 billion.

As a waiver funded by Medicaid, HCBS waivers are subjected to the oversight of the Centers for Medicare and Medicaid Services (CMS). To ensure the proper use of Medicaid funds, the CMS sets specific performance measurements and assurances to which the APD must adhere. Failure to adhere can limit the federally matched dollars contributed to iBudget.

The delivery of iBudget services involves a pipeline of stakeholders. Each APD client who receives HCBS waiver services is required to meet with a Waiver Support Coordinator (WSC). The WSC helps determine the needs of the client, helps the client to budget the funds provided by the HCBS waiver, coordinates support and services, and creates an Annual Support Plan to guide the delivery of services, which is then performed by a network of specialized service providers.

To better serve clients and secure program integrity, the APD proposed a project to develop a Client Data Management System (CDMS)—for use by the APD, WSCs, service providers, and APD clients— to serve as a centralized, digitized client record and provide electronic visit verification (EVV)<sup>2</sup> to ensure the proper delivery of services and maintain adherence to CMS performance measurements and assurances. The resulting product is known as iConnect.

iConnect is an online portal that WSCs and service providers must utilize each time they visit an APD client utilizing HCBS waivers. First, iConnect retrieves the user’s geographic coordinates with EVV, proving the user is offering the right service at the right time to the right client. Then, iConnect requires the user to upload notes to describe the visit. Not only is iConnect used for recordkeeping, but it is also

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<sup>1</sup> Agency for Health Care Administration, “Florida Medicaid’s Covered Services and HCBS Waivers: Developmental Disabilities Individual Budgeting Waiver,” retrieved from [https://ahca.myflorida.com/medicaid/Policy\\_and\\_Quality/Policy/federal\\_authorities/federal\\_waivers/iBudget.shtml](https://ahca.myflorida.com/medicaid/Policy_and_Quality/Policy/federal_authorities/federal_waivers/iBudget.shtml), September 28, 2022.

<sup>2</sup> Electronic visit verification (EVV) is a technical method of verifying the delivery of health services within a client’s home. EVV is reliant upon the accuracy of global positioning systems (GPS). Implementing EVV protects clients against fraud or neglect.

the basis of quality assurance reviews, and if the documentation is not uploaded correctly, WSCs and providers are liable for recoupments (paying back Medicaid payments for services provided).

iConnect was developed and implemented by Harmony Information Systems, Inc. (which has since been acquired by Mediware Information Systems and then by Wellsky, Inc.). Wellsky, Inc. proposed a cost estimate to the APD of \$7.4 million, and their resulting contract had a cost cap of \$9.6 million. The contract intended for deliverables to be met by the end of the initial term, July 2018. iConnect has executed one contract renewal and three extensions, with several deliverables yet to be met.

The unexpected longevity of the contract gives taxpayers a reason for concern. Although the value of information technology (IT) projects cannot be overstated—when successful, they provide taxpayers with services in a timely, efficient, and convenient manner—the large-scale, expensive nature, and complexity of IT projects make success a difficult feat.

Florida has a well-documented history of poorly implemented large-scale IT contracts. As seen with projects such as People First, MyFloridaMarketPlace, and Project Aspire, state agencies have demonstrated poor planning, poor contracting, and poor contract oversight and management as it tries to modernize its operations.<sup>3</sup> Serving as the eyes and ears of Florida taxpayers, Florida TaxWatch has evaluated a series of procurement projects, including CONNECT,<sup>4</sup> SLERS-2,<sup>5</sup> and the Agency for Health Care Administration’s Enterprise Data Warehouse (EDW) contract,<sup>6</sup> to encourage the responsible and optimal use of taxpayer dollars. Adding to this series, Florida TaxWatch undertakes this independent research report to review the iConnect procurement and to offer recommendations for managing the contract as it remains active.

## iConnect Procurement

Florida’s procurement system is designed to ensure that public agencies procure goods and services in a manner that ensures fair, open, and transparent competition. A competitive procurement system helps ensure that goods and services procured are more cost effective; protects the public entity, the taxpayers, and the bidders; and avoids the appearance of favoritism in awarding contracts.

### Business Case

In October 2013, the APD released a business case for the development of iConnect. At the time, the APD was responsible for 54,000 clients. Of these clients, 32,000 were actively receiving iBudget services and 22,000 were on a waiting list. The business case outlined that current recordkeeping needed to be modernized to best serve APD clients seeking iBudget services.<sup>7</sup>

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<sup>3</sup> Council on Efficient Government, “Report to the Governor on MyFloridaMarketPlace, People First and Project Aspire,” Report No. R08-002, January 17, 2008.

<sup>4</sup> Florida TaxWatch, “The Aftermath of COVID-19: Rethinking How the State Delivers Services to Floridians In Need,” November 2020.

<sup>5</sup> Florida TaxWatch, “Calling All Cars? Florida’s Statewide Law Enforcement Radio System (SLERS-2) Underscores the Need for Procurement Reform,” April 2021.

<sup>6</sup> Florida TaxWatch, “It Is Time to Overhaul the State Procurement System,” September 2020.

<sup>7</sup> Agency for Persons with Disabilities, Business Case for CDMS Project. The business case can be found within the 2014-2015 and 2015-2016 Legislative Budget Requests.

*“The Agency for Persons with Disabilities currently relies heavily on manual processes as well as disparate, decentralized and in many cases antiquated systems to collect, analyze and report data consistently. The Agency utilizes hundreds of spreadsheets to collect and analyze data which is extremely time consuming for staff and providers and prone to errors and inaccuracies. Overall, the current environment is inefficient, disposed to fraud and abuse and makes it very difficult to track client outcomes.” - Agency for Persons with Disabilities<sup>8</sup>*

The business case also highlighted the importance of staying in compliance with the requirements of the Centers for Medicare and Medicaid Services (CMS). Since HCBS waivers receive federal Medicaid dollars, the execution of the iBudget program must satisfy performance measurements and assurances set by the CMS. The purpose of these performance measurements and assurances is to ensure the federal Medicaid dollars are used properly and with limited waste.

The CMS has a particular interest in reducing fraudulent activity. In 2013, the CMS projected that Florida’s Medicaid budget would lose about three to ten percent of funds to fraud, waste, or abuse.<sup>9</sup> If a new system could obtain a two percent reduction of fraud and billing abuses, an estimated \$5.56 million could be saved per year. To achieve this goal, electronic visit verification (EVV)<sup>10</sup> was a recommended safeguard, and ultimately, the CMS would require EVV for the APD to maintain its current federal medical assistance percentage (FMAP).<sup>11</sup>

To address these concerns, the APD aimed to develop a centralized client data management system with the ability to share notes among stakeholders and to perform EVV. In doing so, the APD designed the new product to secure the following outcomes:

- 1) Fraud Prevention:** achieved by EVV of home-based services; identification, tracking, management, and disposition of recoupment issues; and tracking the standings of providers, such as whether they are active, been reported for abuse or fraud, or subject to corrective actions or remediation plans.
- 2) Measurable Outcomes:** achieved by the capability to conduct longitudinal tracking of client’s progress; service utilization reviews that ensure the most cost effective services are provided; and measurement of client’s progress toward an employment outcome.
- 3) Analysis and Reporting:** achieved by reporting and data analysis of service provision and provider billings to prevent fraud and project client needs and reporting performance measures to the CMS.
- 4) More Efficient Oversight:** achieved by facilitation of Quality Assurance reviews, documentation, and disposition.
- 5) Improved Business Process Efficiencies:** achieved by a virtual portal accessible to APD staff and service providers that enables the retrieval of, and ability to report, client data; electronic access

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<sup>8</sup> Agency for Persons with Disabilities, Business Case for CDMS Project. The business case can be found within the 2014-2015 and 2015-2016 Legislative Budget Requests.

<sup>9</sup> Agency for Persons with Disabilities, Business Case for CDMS Project. The business case can be found within the 2014-2015 and 2015-2016 Legislative Budget Requests.

<sup>10</sup> Electronic visit verification (EVV) is a technical method of verifying the delivery of health services within a client’s home. EVV is reliant upon the accuracy of global positioning systems (GPS). Implementing EVV protects clients against fraud or neglect.

<sup>11</sup> In November 2016, the federal government amended H.R. 34, Section 12006, to require HCB waivers to be monitored with EVV. Failure to do so by January 2021 could result in less matching funds to the state.

to service authorizations; and timely and efficient processing of service requests, monitoring of licensed facilities, and eligibility determination.<sup>12</sup>

The business case assumed the new system could be implemented by a low risk project costing about \$9.2 million over the course of five years, with all benefits actualized as early as July 2015. This was an ambitious goal, and the business case was adjusted in 2014, updating the realization of benefits to 2018.<sup>13</sup>

### **Invitation to Negotiate**

Within the 2013 Legislative Session, the Florida legislature appropriated a nonrecurring \$1,500,000 to enable the APD to initiate a competitive procurement for developing a client data management system with the capability to perform EVV.<sup>14</sup> Following the appropriation, the APD initiated an Invitation to Negotiate (ITN).<sup>15</sup> The APD was seeking vendors who could deliver “Commercial off the Shelf (COTS), Software as a Service (SaaS) solutions that would meet the Agency’s core requirements and expedite the time to deployment.”<sup>16</sup>

Of the seven companies that replied to the ITN, six were determined responsive and evaluated by the Negotiation Team. The four companies with the top-performing evaluations—Therap Services, LLC; Microsoft Corporation; Databank IMX, LLC; and Harmony Information Systems, Inc.—were invited to share their best and final offers (BAFOs). To determine the final selection, the Negotiation Team considered the best price, the ability of the vendor’s approach to meet the APD’s needs and requirements, the vendor’s plan for providing the solution, and business references and experience providing information technology for developmental disability services and/or populations.<sup>17</sup>

At the end of the process, Harmony Information Systems, Inc. (which has since been acquired by Mediware and eventually WellSky, Inc.) was chosen as the vendor. Based upon its BAFO, WellSky, Inc. (WellSky) was expected to complete all deliverables during the original term of the contract, costing about \$2,112,000. The project would likely require a renewal, costing \$1,750,000 per year for three years, to conduct operations and maintenance. If necessary, the project could receive a six month extension following the renewal, costing about \$875,000. The project was expected to cost \$7,362,000 over the course of six and a half years.<sup>18</sup>

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<sup>12</sup> Agency for Persons with Disabilities, Business Case for CDMS Project. The business case can be found within the 2014-2015 and 2015-2016 Legislative Budget Requests.

<sup>13</sup> Agency for Persons with Disabilities, Business Case for CDMS Project. The business case can be found within the 2014-2015 and 2015-2016 Legislative Budget Requests.

<sup>14</sup> Fiscal Year 2013-2014 General Appropriations Act. \$750,000 was from General Revenue Fund and \$750,000 was from the Trust Fund. According to the Fiscal Year 2014-2015 General Appropriations Act, the funding reverted and was reappropriated for Fiscal Year 2014-2015 for the same purpose.

<sup>15</sup> An Invitation to Negotiate is a solicitation by an agency to determine the best method for achieving a specific goal or solving a particular problem and identifies one or more responsive vendors with which the agency may negotiate in order to receive the best value (see, also §287.057(1)(c), Fla.Stat.

<sup>16</sup> WCM01 Contract. Located within the procurement file, accessible within the Florida Accountability Contract Tracking System (FACTS).

<sup>17</sup> WCM01 Contract. Located within the procurement file, accessible within the Florida Accountability Contract Tracking System (FACTS).

<sup>18</sup> Harmony Information Systems, Inc., Best and Final Offer, April 2014. Located within the procurement file, accessible within the Florida Accountability Contract Tracking System (FACTS).

After Wellsky was selected as the vendor, Therap Services, LLC, (petitioner) filed a Notice of Bid Protest letter regarding the award recommendation for the project. The case was filed May 20, 2014. On May 29, 2014, the petitioner filed a voluntary dismissal of the formal protest, and the case closed on May 30, 2014, prior to the entry of a recommended order or final order.<sup>19</sup>

### Original Contract and Amendments

Wellsky was awarded the contract. The three-year contract was a standard two-party agreement by statute, with a term from February 1, 2015 through June 2018. The contract established a cost cap of \$9,606,166. The original contract was reviewed by the Department of Financial Services’ Bureau of Auditing and found to be in accordance with Florida statutes. Since its establishment, the contract has been amended eight times (Table 1). Most amendments are to revise the timeline of the project. The contract also has eight internal budget amendments.

Table 1. iConnect Contract Amendments		
Amendment	Actions	Effective Date
1	Revised the Contract Price and Schedule, Amendment Labor Rates, Deliverables, Operations and Maintenance Costs, and Project Schedule.	August 1, 2016
2	Amended Project Schedule, with a new expectation that project closeout would occur in April 2020.	December 22, 2017
3	Renewal Amendment. The contract should now end on June 30, 2021. No change to contract cost amount.	July 1, 2018
4	Cost Table for Operations and Maintenance Costs is revised.	August 15, 2018
5	The Cost Table for Deliverables is revised. Although project closeout was not revised (listed as May 2018), other deliverables are changed for dates as late as May 2021.	April, 2020
6	Extension Amendment. The contract should now end on December 31, 2021.	July 1, 2021
7	Extension Amendment. The contract should now end June 30, 2022.	January 1, 2022
8	Extension Amendment. The contract should now end December 31, 2022.	July 1, 2022

<sup>19</sup> State of Florida Division of Administrative Hearings, Case No. 14-002422BID, Closed, May 29, 2014.

## Current Standing of Contract

To date, the APD has paid \$8,552,734 for contract services, and the total contract amount is \$9,002,417. The APD receives a recurring budgetary amount of \$661,500 for the project and continues to request legislative allocations for its continued implementation. As part of its legislative budget request for FY 2023-2024, the APD sought \$1.3 million.

*“The Agency for Persons with Disabilities (APD, the Agency) requests \$1,278,645 (\$408,744 General Revenue and \$869,901 Operations and Maintenance Trust Fund) of nonrecurring funding in the APD – iConnect category (101556), within the Program Management and Compliance budget entity (67100200), to continue the implementation of a statewide system for the management, reporting, and trending of data for all Agency Medicaid customers.” - APD Legislative Budget Request for FY 2023-2024*

Although the latest extension ends the contract on December 31, 2022, it is unclear when the contract will actually end. The APD 2022 Long Range Program Plan (LRPP) claims iConnect will be fully implemented by the end of the current extension,<sup>20</sup> but the latest implementation plan assumes the project closeout will occur April-June 2024.<sup>21</sup>

## Audits

While the contract for iConnect was reviewed by the Department of Financial Services’ Bureau of Auditing the year it was established, no subsequent audits have directly evaluated iConnect. The APD, however, has undergone two operational audits since the start of the iConnect contract. The audits, executed by the State of Florida Auditor General, evaluated the APD’s contract management processes, among other selected administrative activities. The first audit (May 2017) published the following findings related to contract management, and the findings were reiterated in the follow-up audit (December 2021):

- The Agency did not conduct required contract monitoring activities during the period July 2014 through January 2016 as well as the period July 2019 through January 2021; and
- The Agency did not always timely post contract information to the Florida Accountability Contract Tracking System (FACTS) as required by State law.<sup>22</sup>

Although these audits did not directly address iConnect, they describe the contract management practices to which iConnect has been subjected. Inadequate contract management can impede optimal outcomes.

*“Absent the conduct of required monitoring activities, the Agency has reduced assurance that contract providers complied with contract terms and conditions and that the desired service outcomes were achieved.” - Florida Department of Financial Services<sup>23</sup>*

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<sup>20</sup> Agency for Persons with Disabilities, Long Range Program Plan, September 2022.

<sup>21</sup> Agency for Persons with Disabilities, Legislative Budget Request for FY 2023-2024, October 2022.

<sup>22</sup> State of Florida Auditor General, “Agency for Persons with Disabilities,” N. 2017-204, May 2017. See also, State of Florida Auditor General, “Agency for Persons with Disabilities,” N. 2022-057, December 2021.

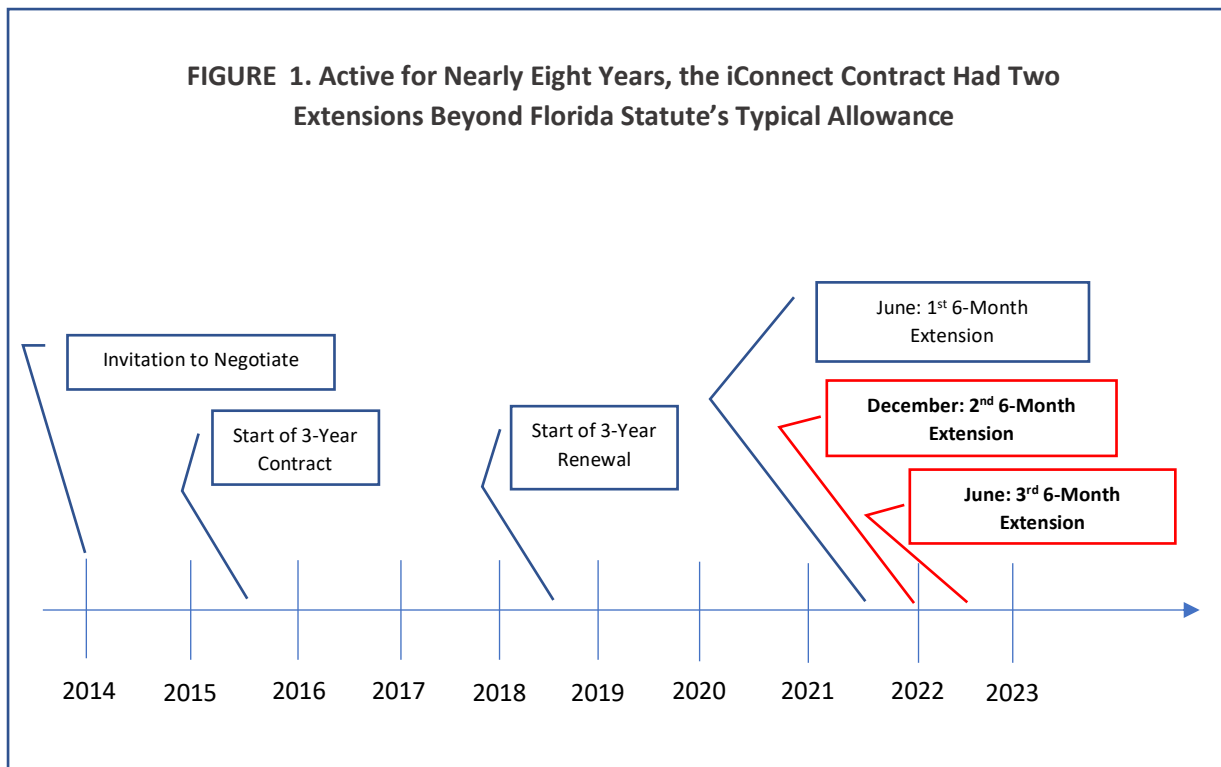
<sup>23</sup> State of Florida Auditor General, “Agency for Persons with Disabilities,” N. 2022-057, December 2021.

## Florida TaxWatch Findings

As the eyes and ears of Florida taxpayers, Florida TaxWatch looked at APD’s performance against the terms and conditions of the contract, and against the requirements of Florida law (Chapter 287, Florida Statutes). As the contract nears its close, the following concerns should be considered and addressed by the APD, and in some cases, the Florida Legislature.

### The iConnect Timeline Exceeds Statutory Allowance

The vendor established a fifteen-month implementation plan for deploying iConnect, planning to assume a support role for the remainder of the contract.<sup>24</sup> After the contract was negotiated and signed, a three-year time frame was developed for the delivery of iConnect. The project would be initiated January 2016 and the vendor would complete its project closeout report May 2018.<sup>25</sup> In December 2017, the schedule of deliverables was amended, shifting project closeout to April 2020.<sup>26</sup> A timetable for the iConnect project is provided in Figure 1.



The contract was renewed July 1, 2018. The renewal of a procurement contract is contingent upon “satisfactory performance evaluations by the agency.”<sup>27</sup> For a contract that has an original term value exceeding \$5 million, a written report concerning contract performance must be submitted to “the

<sup>24</sup> WCM01, Procurement.

<sup>25</sup> WCM01, Amendment 1, August 2016.

<sup>26</sup> WCM01, Amendment 2, December 2017.

<sup>27</sup> F.S. §287.057 (14)

Governor, the President of the Senate, and the Speaker of the House of Representatives at least 90 days before execution of the renewal or amendment.”<sup>28</sup>

The iConnect contract has been extended three times. Florida Statutes explicitly limit a procurement contract to one extension, lasting up to six months.<sup>29</sup> Florida Statutes acknowledge “events beyond the control of the contractor” to be an exception that allows more than one extension. A review by Florida TaxWatch of the extension documentation posted on the FACTS website found no written justification for the second and third extensions.

Currently, the date of the final project closeout remains unclear. The latest extension ends December 31<sup>st</sup>, 2022.<sup>30</sup> Although the APD 2022 Long Range Program Plan claims iConnect will be fully implemented by the end of the current extension,<sup>31</sup> the latest implementation plan assumes the project closeout will occur April-June 2024.<sup>32</sup> As a contract that has already implemented the extension allowed by Florida statutes, pursuing a timely closeout should be a priority.

### **Deliverables are Still Unmet**

The implementation of iConnect is not yet complete. As of October 2022, the following deliverables have yet to be delivered:

- Deliverable #4B: Financial Management Deployment Authorization
- Deliverable #13: Consumer Portal Requirements
- Deliverable #14: Consumer Portal Deployment Authorization
- Deliverable #15: Consumer Portal Training Completion Report
- Deliverable #16: Go Live Consumer Portal (Consumer Self-Service Users)
- Deliverable #23: Project Closeout Report
- Deliverable #24: Deliverable Submission and Acceptance: Warranty Completion Report<sup>33</sup>

Beyond project closeout and warranty completion, most of the remaining deliverables are related to creating a consumer portal. The fulfillment of a consumer portal remains important as a tool for empowering APD clients and providing self-determination. The intent of the consumer portal is to give APD clients and their caregivers access to their records. The consumer portal would enable clients or their caregiver to input client central demographic information; documentation, such as Referral Forms, Application for Services, or Consumer-Directed Care Plus (CDC+) applications; and updated information for CDC+ Purchasing Plans.<sup>34</sup> Currently, the consumer portal is expected to launch during the third quarter of FY 2022-2023.<sup>35</sup>

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<sup>28</sup> F.S. §287.057 (14)

<sup>29</sup> F.S. §287.057 (13)

<sup>30</sup> WCM01, Amendment 8, July 2022.

<sup>31</sup> Agency for Persons with Disabilities, Long Range Program Plan, September 2022.

<sup>32</sup> Agency for Persons with Disabilities, Legislative Budget Request for FY 2023-2024, October 2022.

<sup>33</sup> Agency for Persons with Disabilities, Legislative Budget Request for FY 2023-2024, October 2022.

<sup>34</sup> Agency for Persons with Disabilities, Legislative Budget Request, September 2022.

<sup>35</sup> Agency for Persons with Disabilities, Legislative Budget Request, September 2022.

## The Absence of a Claims Module Creates an Inconsistency with Contract and Law

Within the iBudget program, service providers submit claims through AHCA’s Florida Medicaid Management Information System (FMMIS). Using FMMIS, the providers receive payment and are required to provide the WSCs with documentation evidencing the validity of the claim within ten days. If the documentation is late or not submitted, AHCA staff must take time to ensure they receive recoupment for undocumented services. This “after-the-fact enforcement system” for processing iBudget was considered inefficient and a detriment to program integrity.<sup>36</sup> To better facilitate services, APD committed to delivering a claims module as part of iConnect. In September 2022, the APD announced that it was discontinuing the feature. Providers would continue using FMMIS for billing. In 2020, the Florida legislature passed a law (SB 82) requiring service providers to use the iConnect claims module as the official form of payment for iBudget services. Discontinuing the claims module and continuing the use of the FMMIS for billing appears to be contrary to the plain language of Florida Statutes.

*“As a condition of payment and before billing, persons or entities under contract with the agency to provide services shall use agency data management systems [iConnect] to document service provision to clients shall use such systems to bill for services,” – § 393.066, Fla. Stat. (2020).*

The APD should be cautious to resolve other potential inconsistencies with the contract.<sup>37</sup>

## Limited Interface Capabilities

Within its BAFO, Wellsky included a provision to create a software that could interface with the data systems of providers, specifically acknowledging Therap Services, LLC., as one of the supported third-party data systems, but to date, no such interface has been implemented. Interoperability is invaluable to service providers because interfacing reduces redundancy caused by double data entries and makes business operations more efficient. For the same reasons, the ability to interface could also be valuable to WSCs who use data systems like ACHIEVE Analytics.<sup>38</sup>

The contract also included a business requirement to support interface with other data systems within the APD, such as the Allocation Budget and Contract Control System (ABC), Consumer Directed Care Plus (CDC+), iBudget, and Question for Situational Information (QSI).<sup>39</sup> At the start of contract, Wellsky noted that the proposed solution would not be able to properly deliver this type of interoperability, but the

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<sup>36</sup> Florida House of Representatives, Staff Final Bill Analysis CS/SB 82, May 2020.

<sup>37</sup> For example, the ability to track and analyze incidents was listed as a benefit of iConnect, but now the APD is pursuing an Incident Management System—which is an additional system outside of iConnect—to achieve this objective. APD requested \$2.1 million from the legislature to implement the Incident Management System. The development of a new system suggests that iConnect did not deliver its expected functionality.

<sup>38</sup> Within the Information Technology and Business Supporting Requirements, requirement #39 calls for the ability to interface with external systems, including those used by providers. Although interfacing with data systems used by WSCs is not explicitly in the contract, the contract does claim that interfaces with external systems is not limited to those listed.

<sup>39</sup> WCM01 Procurement. Located within the procurement file, accessible within the Florida Accountability Contract Tracking System (FACTS).

company could develop an interface as part of implementation.<sup>40</sup> The APD should ensure this aspect of the contract is delivered.<sup>41</sup>

### **Onboarding Requires Greater Support**

Prior to iConnect, most persons involved with the delivery of iBudget services were not required to have electronic data interaction with the APD. Now, thousands of WSCs and service providers who work with the APD must utilize the software to run their businesses. To parties using the software daily, and liable for recoupments upon misuse or error, the functionality of iConnect is especially important.

It is important to note that the service providers and WSCs who use the iConnect program daily range in size from small “mom and pop” businesses to large corporations. Large corporations have begun hiring additional personnel to manage iConnect. Smaller businesses have greater difficulty hiring and training additional dedicated staff to manage iConnect, which further strains their daily operation.

Currently, WSCs and service providers face difficulties accessing their portal, uploading documents, maintaining records, and using EVV. When they cannot resolve their difficulties, they may be unable to provide the proof of service needed to pass their quality assurance reviews conducted by Qlarant. Failures during the reviews can lead to recoupments and corrective action plans. During early onboarding stages, the APD allowed a grace period that would forgive any discrepancies, but the latest grace period ended July 1, 2022.

As WSCs and service providers continue to grow accustomed to iConnect, their primary source of support is a help desk, and unfortunately, this resource is not adept at resolving technical issues. For example, the help desk cannot fix an EVV that claims the WSC or service provider is a block away from their present client. When these issues cannot be resolved, WSCs and service providers lack an alternative procedure to circumvent the technical issue, which can lead to time with their client spent troubleshooting.

If the support structure for onboarding WSCs and service providers is not reconsidered, the APD risks losing valuable partners for the iBudget program. Based upon stakeholder interviews, Florida TaxWatch found that undue burdens upon the operations of WSCs and service providers can alienate businesses or their employees. Some providers specifically choose services or private clients based upon whether they can avoid using the iConnect software. Employees with years of experience are leaving their roles as WSCs and providers. As professionals leave, long-term provider-client relationships come to an end, turnover within WSC and provider organizations become exacerbated, and important, institutional knowledge from the field is lost.

The iBudget program needs well-trained professionals. With more than 22,500 persons on its waiting list,<sup>42</sup> there is no shortage of people in need of services. If experienced providers and WSCs continue to

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<sup>40</sup> WCM01 Procurement. Located within the procurement file, accessible within the Florida Accountability Contract Tracking System (FACTS).

<sup>41</sup> The APD could benefit from comparing the technological objectives of iConnect with objectives of upcoming projects. iConnect was intended to take over the data stored in ABC, and currently, the APD is pursuing a project to rewrite ABC. If this project takes responsibility for features that should be provided by iConnect, rather than complementing the data system, the APD should consider why iConnect failed to deliver these expectations.

<sup>42</sup> The Agency for Persons with Disabilities, Long-Range Program Plan, September 2022.

leave, Florida will miss the opportunity to give APD clients the best services available, and within a competitive labor market, the risk of lost talent cannot be ignored.

With the contract scheduled to expire on December 31, 2022, it would be beneficial for the APD to host a debrief with stakeholders regarding their ability to utilize iConnect. With the insight of daily users, the APD can gain direction as to what to inquire of its vendor to receive a beneficial, functional product. Fine-tuning functionality is especially important as the Agency continues to develop a consumer portal for its clients.

## Conclusions

The iConnect project was a necessary investment to ensure better delivery of iBudget services. Intended to house more than 58,000 client records, create access and editing rights for multiple stakeholders, and update security and monitoring measures to protect clients who are part of a particularly vulnerable community, iConnect was an ambitious undertaking and important to the overall framework of the iBudget service delivery system. Investing in iConnect was the right direction for the department; however, concerns remain regarding the management and delivery of the contract.

Florida's government is entrusted with taxpayer dollars to provide public services, but this trust is embedded with the expectation that such dollars will be used responsibly to deliver optimal value back to the taxpayers through the services provided. When government agencies use taxpayer dollars—such as with procurements—how the agency frames, contracts, and implements a project should be held accountable to following proper business processes and creating a positive experience for the taxpayers.

## Recommendations

**The APD should revise its internal contract management processes to hold vendors accountable for the timely provision of contract deliverables and to comply with chapter 287, Florida Statutes.**

Compliance with chapter 287 is particularly important given that the iConnect contract is scheduled to expire on December 31, 2022 (reference Amendment 8).

**The APD should provide consistent documentation when establishing new deliverables and project schedules.** iConnect's documentation reflects inconsistencies that limit the transparency of the project. For example, Amendment 5 updates the timeline for certain deliverables, some to dates as late as May 2021, but the project closeout, which should be the last deliverable, was unrevised and set for May 2018.

**The APD should amend the contract to reflect the abandoned claims module.** The APD released a notice to providers that a claims module would be redundant and no longer necessary. While this change is in the best nature of the project, the claims module was an expectation of the contract, so relevant changes should be made through a contract amendment. To further remedy any potential issues arising from the abandoned claims module, **the Florida Legislature should amend Florida Statute 393.066 to eliminate the requirement of a claims module.**

As the Florida Legislature reviews Florida Statute 393.066, they should also consider **creating an amendment to allow for electronic submission of information to iConnect.** This will allow providers that have independently invested in technology to avoid the disruption of adapting to new software and

the time, cost, and potential for error of dual data entry. The technology to provide the interface has already been developed and was committed to by Wellsky as part of the initial contract.

**The APD should provide alternative procedures when technical issues occur within the presence of a client.** To ensure time spent with the client is used correctly, the APD should establish alternate procedures that allow WSCs and providers to troubleshoot with iConnect after a session with a client is complete.

**The APD should host a debrief with stakeholders and enhance supports for stakeholders.** As the APD considers how iConnect could better serve stakeholders, they should invite stakeholders to share their experience with the product. To illustrate the value of conducting a debrief, Florida TaxWatch interviewed WSCs and service providers (Appendix: Stakeholder Interviews).

**The APD should consider how best to improve delivery of iConnect services.** Given that the current extension expires on December 31<sup>st</sup>, 2022, APD needs to decide whether to correct the problems identified during stakeholder interviews by Florida TaxWatch or allow the contract to expire and pursue procurement of a new system. Should they extend the contract, the APD should consider implementing software updates or complementary SAAS products to enhance functionality in response to the identified issues.

## Appendix: Stakeholder Interviews

After reviewing the procurement, contract, and amendments to iConnect, as well as any relative information found within the APD’s long-range program plans and legislative budget requests, Florida TaxWatch conducted interviews with service providers and WSCs to determine whether all of the expectations of iConnect have been met and what improvements could be pursued to enhance the system. Florida TaxWatch compared its findings to an APD presentation that lists how the software would support iBudget stakeholders (Table A) to highlight the expectations of the project that have yet to be fulfilled. Florida TaxWatch looks forward to engaging with the APD and encouraging them to leverage these findings for the improvement of iConnect.

Table A. Expected Stakeholder Benefits of APD iConnect			
APD	Clients	Providers	Waiver Support Coordinators (WSC)
<ol style="list-style-type: none"> <li>1. Access to a customer central record of information.</li> <li>2. Efficient and streamlined workflow and process improvement for APD staff.</li> <li>3. Increased efficiency of communication by having all customer information available and centralized.</li> <li>4. Greater ease tracking compliance and accuracy with quality reviews.</li> <li>5. Ability to act with compliance and accuracy when reporting to the Centers for Medicare and Medicaid Services (CMS) without relying on manual collection of data and paper reports.</li> <li>6. Delmarva (now known as Qlarant) will be able to view customer and provider records prior to on-site visits, reducing time on paperwork and adding more time for quality interviews.</li> <li>7. Ability for the agency to capture trends, assess success, and monitor issues electronically.</li> </ol>	<ol style="list-style-type: none"> <li>8. Role-based access to their own records in iConnect through a secure login for both customer and designated caregiver. Access includes a Consumer Portal to view their current plan, authorizations, and services.</li> <li>9. Person-centered support plan to capture the plan for services and goals for the future (referred to as an Annual Support Plan).</li> <li>10. Service notes will have visibility.</li> </ol>	<ol style="list-style-type: none"> <li>11. Have their information, services and service rates listed within the system.</li> <li>12. Secure, role-based access to view and receive authorizations and claims as well as view selected portions of the consumer record for customers assigned to them.</li> <li>13. Improved filing of claims by complete electronic billing and electronic processing of claims through the APD iConnect system with an immediate response of claim status and notification when changes are needed for the claims to pass the adjudication process.</li> <li>14. Better monitoring of services, including the ability to add service logs to consumer records, communicate support plan progress, and enter documentation of services rendered and implementation plans.</li> <li>15. Online form completion.</li> <li>16. Partake in electronic verification on in-home services to comply with the 21<sup>st</sup> Century Cures Act (Cures Act).</li> <li>17. Enable new providers to apply online and current providers to request expanded services.</li> </ol>	<ol style="list-style-type: none"> <li>18. Access to HCBS eligibility worksheet.</li> <li>19. Recordkeeping of support plans and progress notes shared among stakeholders.</li> <li>20. Processing of SANs requests and service authorization.</li> <li>21. Access to iBudget information and cost plans.</li> </ol>

Agency for Persons with Disabilities, "APD iConnect: A Client Data Management System," 2017.

## APD

The APD now has a digitized, centralized recordkeeping system, increasing its capacity to serve clients, monitor the delivery of services, and provide proper documentation to the CMS. The new system was a much needed update to ensure that thousands of APD clients are being properly served, but certain aspects of the system should be improved to ensure all expectations are realized before the close of contract (Table B). Based upon public documents and stakeholder interviews, Florida TaxWatch identifies one APD benefit that continues to face challenges, and without the insight of the APD, Florida TaxWatch can only assume the other benefits have been met.

Table B. While APD Benefits are Likely Realized, Some Improvements are Necessary to Ensure All Benefits are Met Before the End of the Contract	
Met	Recommended for Review
<ol style="list-style-type: none"><li>1. Access to a customer central record of information.</li><li>2. Efficient and streamlined workflow and process improvement for APD staff.</li><li>3. Increased efficiency of communication by having all customer information available and centralized.</li><li>5. Ability to act with compliance and accuracy when reporting to the Centers for Medicare and Medicaid Services (CMS) without relying on manual collection of data and paper reports.</li><li>6. Delmarva (now known as Qlarant) will be able to view customer and provider records prior to on-site visits, reducing time on paperwork and adding more time for quality interviews.</li><li>7. Ability for the agency to capture trends, assess success, and monitor issues electronically.</li></ol>	<ol style="list-style-type: none"><li>4. Greater ease tracking compliance and accuracy with quality reviews.</li></ol>

### 4. Greater ease tracking compliance and accuracy with quality reviews.

When the system is working properly, the APD has a greater ability to track compliance and accuracy with quality reviews. At this stage of implementation, providers and WSCs still face difficulties accessing their accounts and uploading documents, even with assistance from the help desk. When technical difficulties disrupt use of the software, it can impact the quality assurance reviews conducted by Qlarant, which can cause providers and WSCs to face unfounded recoupment and investigations despite dutiful delivery of services to clients.

*Stakeholder Recommendation 1:* Review and update the processing of login information to minimize the risk of technical issues.

*Stakeholder Recommendation 2:* Establish a proper procedure for adapting to technical issues occurring during the delivery of a service as well as a procedure to refute recoupment of a service that was faithfully delivered.

## Clients

Promised improvements for the operations of the APD, WSCs, and service providers all support the delivery of services to clients, but the system also promises to empower clients with a capability for self-direction, self-determination, and person-centered planning and choice. The mechanisms to satisfy these promises, such as a consumer portal and person-centered support plan, need improvements before the end of the contract (Table C).

Table C. Improvements are Necessary to Ensure Clients Receive their Direct Benefits	
Met	Recommended for Review
None	<p>8. Role-based access to their own records in iConnect through a secure login for both customer and designated caregiver. Access includes a Consumer Portal to view their current plan, authorizations, and services.</p> <p>9. Person-centered support plan to capture the plan for services and goals for the future (referred to as an Annual Support Plan).</p> <p>10. Service notes will have visibility.</p>

### **8. Role-based access to their own records in iConnect through a secure login for both customer and designated caregiver. Access includes a Consumer Portal to view their current plan, authorizations, and services.**

The iConnect contract required Wellsky to deliver a consumer portal, giving the client and their caregiver access to their records. The consumer portal should enable clients or their caregiver to input client central demographic information; documentation, such as Referral Forms, Application For Services, or Consumer-Directed Care Plus (CDC+) applications; and updated information for CDC+ Purchasing Plans. Currently, the consumer portal is expected to launch during the third quarter of FY 2022-2023.<sup>43</sup>

*Stakeholder Recommendation 3:* Closely monitor the deployment of the consumer portal ensuring that the system is user-friendly to the clients.

### **9. Person-centered support plan to capture the plan for services and goals for the future (referred to as an Annual Support Plan).**

The most important document for ensuring providers perform the right services is the Annual Support Plan. Annual Support Plans are prepared by WSCs to guide the delivery of services in a way that caters to the specific needs of the client. The Annual Support Plan can only be added as a note, which can make it difficult for providers to find and utilize the document.

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<sup>43</sup> Agency for Persons with Disabilities, Legislative Budget Request, September 2022.

*Stakeholder Recommendation 4:* Add a specific section to the portal dedicated to accessing Annual Support Plans, ensuring the most integral part of service delivery is readily available.

**10. Service notes will have visibility.**

The organization of iConnect is difficult to navigate. Each visit with a client, WSCs and providers are required to track information as “notes.” The software does not compile the information from notes, nor does it provide filtering capabilities, so providers must click on each individual note to find what they need. The structure of note-taking limits providers as they try to analyze and comprehend what the culmination of notes indicates about the needs of their clients.

*Stakeholder Recommendation 5:* Evaluate and update how iConnect delivers client information, making the upload and review of notes less burdensome.

**Providers**

Florida has more than 4,500 service providers who work with the APD. Since 2020, service providers have been onboarded into iConnect in waves that are determined by their service type. As a party using the software daily, and liable for recoupments upon misuse or error, the functionality of iConnect is especially important to service providers. Based upon interviews with service providers, their current challenges include difficulties accessing their portal, submitting billing, monitoring services, and partaking in EVV (Table D). Many of the issues also affect WSCs.

<b>Table D. Improvements are Necessary to Ensure Providers Can Support Clients</b>	
<b>Met</b>	<b>Recommended for Review</b>
11. Have their information, services and service rates listed within the system. 17. Enable new providers to apply online and current providers to request expanded services.	12. Secure, role-based access to view and receive authorizations and claims as well as view selected portions of the consumer record for customers assigned to them. 13. Improved filing of claims by complete electronic billing and electronic processing of claims through the APD iConnect system with an immediate response of claim status and notification when changes are needed for the claims to pass the adjudication process. 14. Better monitoring of services, including the ability to add service logs to consumer records, communicate support plan progress, and enter documentation of services rendered and implementation plans. 15. Partake in electronic verification on in-home services to comply with the 21 <sup>st</sup> Century Cures Act (Cures Act). 16. Online form completion.

## 12. Secure, role-based access to view and receive authorizations and claims as well as view selected portions of the consumer record for customers assigned to them.

The providers, as well as WSCs, have struggled accessing their iConnect portals and using it properly. Without the ability to login, the service providers are not able to submit their forms, perform EVV, gain access to client support plans and records, and add notes. Even once a user logs into the system, there can be difficulty uploading documents to the right spot. This hindrance limits the service providers ability to deliver services to clients and to ensure that the APD has the information they need.

In accordance with the CMS standards, the APD monitors the delivery of services to ensure that Medicaid money is used properly. When service providers cannot use the portal, the APD cannot monitor them appropriately. Not only does this obscure the APD's understanding of how a client is being treated but it also results in recoupments. A recoupment is paid by the service provider if proof of service is not correctly uploaded to iConnect.

When the technical issue is due to the username and password, overcoming the issue is especially burdensome. Retrieving a password requires a multi-factor verification. One aspect of the verification is receiving a pin number from a call, and sometimes the pin does not work. Another aspect is based upon the credit score of the user, which is problematic because if the account has a hold or is frozen, the user cannot access the iConnect portal.

Some issues have not been resolved even after service providers try using the resources provided by the APD. The resources of last resort are the APD Zendesk, a help service over the internet, and Zendesk Helpline, a help service over the phone. The help desk staff are often ill-equipped to handle technical difficulties. This is a great risk to providers because when the Zendesk and Zendesk Helpline fail to resolve an issue, the service provider is still liable for recoupments.

One service provider shared that they submitted four Zendesk Requests, receiving the same response each time, and then started calling the Zendesk Helpline. Despite the technical difficulties being beyond their control—and their ability to show paper documentation to prove the delivery of their service—they were charged a recoupment of \$1,400. Although Qlarant, the reviewer, allows for reconsideration reviews, it does not accept documentation for which it did not originally have access, so the missing iConnect forms are unresolvable.

Even when their portal is functioning, troubles navigating the site has limited the ability of service providers to efficiently review client records. Users are sometimes forced to wait an excess of 10 minutes for their pages to load, wasting time they are trying to spend serving clients. The portal has redundant pages and navigation headings leading to nowhere. Client records are written as large notes and the system lacks the ability to filter the data in meaningful ways, so it is difficult for service providers to find the information they need.

*Stakeholder Recommendation 6:* Evaluate and resolve iConnect programming that may influence login and document upload difficulties.

*Stakeholder Recommendation 7:* Establish a policy and procedure for service providers that are delivering a service but do not have access to iConnect.

*Stakeholder Recommendation 8:* Establish a policy and procedure to refute recoupments for services when a service provider properly delivered a service but did not have access to iConnect.

*Stakeholder Recommendation 9:* Evaluate and update Zendesk training, making employees better versed at navigating technical difficulties and empowering them to direct providers and WSCs to temporary alternative solutions when the long-term solution may take a prolonged period of time.

*Stakeholder Recommendation 10:* Evaluate the iConnect software and update the system in ways that make reviewing client records more efficient, such as addressing the long loading times and adding a capability to filter the data.

### **13. Improved filing of claims by complete electronic billing and electronic processing of claims through the APD iConnect system with an immediate response of claim status and notification when changes are needed for the claims to pass the adjudication process.**

As previously discussed, one of iConnect's original deliverables was a feature to complete electronic billing, but the deliverable was dropped in September 2022. Instead, service providers will continue using FMMIS for billing. Since dropping the deliverable was likely the best choice, Florida TaxWatch does not recommend delivering this unfulfilled expectation.

### **14. Better monitoring of services, including the ability to add service logs to consumer records, communicate support plan progress, and enter documentation of services rendered and implementation plans.**

Service providers require a good monitoring system to support their service delivery, pass Qlarant reviews, and satisfy Medicaid audits. Monitoring services requires a level of data collection, analysis, and monitoring that is not provided through iConnect. To ensure they are providing optimal service delivery, service providers often use secondary recordkeeping programs, even though it currently requires duplicated data entry. One of the most commonly used system by Florida providers is Therap, and in 2018, the APD agreed to launch a pilot to interface the software with iConnect. Four years later, despite receiving programmed files from Therap, a pilot has not been launched.

Monitoring services is not only important for protecting the client but also for ensuring the service provider has the documentation to prove that the services were properly rendered. As recipients of Medicaid funds, WSCs and service providers are subjected to audits performed by the U.S. Centers for Medicare and Medicaid Services (CMS). Medicaid audits require WSCs and service providers to show proof of service delivery, which can include up to seven years of operations. Since WSCs and service providers lose access to the records of previous APD clients, the parties must print each iConnect note or upkeep a second record system to ensure they maintain the necessary information for audits.

*Stakeholder Recommendation 11:* Work with Therap to develop and implement programming that would allow providers to interface iConnect with Therap.

*Stakeholder Recommendation 12:* Expand the service providers' access to client records, allowing them to review necessary information to pass a Medicaid audit but removing access to edit the records.

### **15. Implement electronic verification on in-home services to comply with the 21<sup>st</sup> Century Cures Act (Cures Act).**

To reduce fraud, the Cures Act requires that Medicaid waivers be monitored using electronic visit verification (EVV). EVV uses geo-tracking technology to ensure that workers are with the client they are supposed to be serving. If WSCs and providers fail to use EVV during their delivery of services, their claims will be invalid, resulting in recoupment.

EVV not only reduces fraud but also ensures compliance with regulations set by CMS. Adhering to regulations is necessary for securing the optimal amount of federal matching funding for HCBS waivers. The money is substantial, with match funding contributing more than one billion dollars for FY 2022-23. EVV became required for Personal Care Services in January 2021 and will become required for Home Health Care Services necessitating in-home visits in January 2023.<sup>44</sup>

Several users experience issues with the geo-tracking of EVV. EVV does not work well in rural areas and sometimes shows a provider or WSC in a spot a couple of blocks off from where they are actually performing their services. The technical issue risks fining workers who are faithfully performing their duties and subjecting providers to unfounded fraud investigations.

*Stakeholder Recommendation 13:* Update the geo-tracking technology to ensure it properly serves the need of EVV.

*Stakeholder Recommendation 14:* Determine a proper procedure for delivering services amid geo-tracking technical issues as well as a procedure for disputing fines that result from geo-tracking errors.

## **16. Online Form Completion.**

Providers and WSCs have claimed that the format of the online forms are more time consuming and complicated than prior requirements. There is also greater chance for error, threatening a provider's standing during a Qlarant review or Medicaid audit. When online forms are not completed correctly, providers and WSCs are subject to recoupment.

One of the most common discrepancies occurs with billing. To account for this, the APD offered a grace period, not requiring recoupment from Supported Living Coaching providers from November 2021 through June 2022 nor from Personal Supports and Respite providers from July 2021 through December 2022. Once a grace period is over, the service providers resume responsibility for discrepancies.

While some of the issues with forms arise from technical issues, others occur because the software is difficult to use. All the learning resources for providers and WSCs are online, but the materials are complex and time-consuming. Since the implementation is not complete, it is often unclear whether the training materials are updated to reflect system changes. Some service providers have begun hiring staff members with the sole job of entering data.

*Stakeholder Recommendation 15:* Review and evaluate the online form process. Ensure the forms are simple and straightforward.

*Stakeholder Recommendation 16:* Analyze the most common Zendesk ticket questions to identify the most common issues for uploading forms to iConnect. Use the findings to provide better training materials or updates to the portal.

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<sup>44</sup> Agency for Persons with Disabilities, Long Range Plan, September 2022.

## Waiver Support Coordinators (WSCs)

APD clients that are using HCBS Medicaid waivers are required to receive support coordination. Support coordination is conducted by WSCs. The WSC assists individuals trying to access iBudget services and create the Annual Support Plans, the document that determines the needs and goals of clients to help guide service delivery performed by providers. After interviewing WSCs, Florida TaxWatch identifies two expected benefits from iConnect that have yet to be fulfilled.

Table E. Improvements are Necessary to Ensure Waiver Support Coordinators Can Support Clients	
Met	Recommended for Review
18. Access to HCBS eligibility worksheet. 21. Access to iBudget information and cost plans.	19. Recordkeeping of support plans and progress notes shared among stakeholders. 20. Processing of SANs requests and service authorizations.

### 19. Recordkeeping of support plans and progress notes shared among stakeholders.

The WSCs share many of the same burdens as service providers. They face difficulty overcoming long loading times, navigating the site, and handling login and technical issues. When WSCs cannot perform their work, it affects the work of providers, ultimately impacting the services received by clients.

Adding new WSCs to the system is especially challenging. After the new WSCs go through their training, they cannot gain access to iConnect for about two months because they have to get a Medicaid number before they are let into the system. For those two months, the WSCs are working with clients so they have to use their supervisor's account. Since the supervisor's account is used, they are responsible for any ethical violations committed by new WSCs.

When WSCs try to maintain their records, they have limited ability to update notes. WSCs can only add one note per day and there are limited opportunities to add follow-up notes with additional client information, which can lead to WSCs leaving out valuable information. If an update is extremely important, a WSC would need to place a ticket with the APD to cancel the original note so they can place a new note. If a WSC tries to update a note that is billable days after the service, the date on the note changes, and since the original billable date is lost, the WSC may be fined.

Updating cost plans is also difficult with the new system. To access a cost plan, a user needs to be a WSC. Then the user has to switch roles, adopting a cost plan adjustment role, to make the adjustment. The adjustment is attached to the budget, and finally, the user needs to return to the WSC role before submitting the document.

Like service providers, WSCs benefit from secondary recordkeeping programs. One such program is ACHIEVE Analytics (ACHIEVE). ACHIEVE provides notifications, such as when support plans are due; note tracking; and data analysis, such as whether there is an increase in behavior, emergency room visits, or hospitalizations. Under present circumstances, the WSCs must do double data entry to make use of

secondary recordkeeping programs. Less time would be required to enter data if their secondary system interfaces with iConnect, but no such interface is currently being developed by APD's vendor.

WSCs are also subject to Medicaid audits. Medicaid audits require up to seven years of documented service, but iConnect does not let WSCs access the records of clients who are no longer receiving services. To ensure they have the necessary documents to prove service delivery, WSCs either print every record or use a secondary system to maintain records. Either option is an undue burden upon the time and resources of WSCs.

*Stakeholder Recommendation 17:* Develop standard interface standards to allow iConnect to receive information from systems such as ACHIEVE which are commonly used by WSCs.

*Stakeholder Recommendation 18:* Expand the WSCs access to client records, sharing enough information to ensure they can pass a Medicaid audit.

## **20. Processing of SANs requests and service authorizations**

A Significant Additional Needs (SANs) request is used to change the services of clients. In iConnect, WSC must cancel original authorizations and create a brand new one if they are adding services to an existing authorization. Sometimes the APD requests a rate change for individuals. To complete the rate change within iConnect, the WSCs to call around the community to determine whether the service is provided for free somewhere locally; providing a schedule for the client, even if their schedule has not changed; and a brand new SANs request.

Like other aspects of iConnect, ineffective trainings have impacted attempts to process SANs requests and service authorizations. WSCs who were active at the start of their iConnect rollout went to a one day training, and new WSCs have an online training. Neither training method is comprehensive enough to prepare WSCs for the iConnect system. As case workers, WSCs do not have a technical background, which makes adapting to the new, complex system very difficult.

*(Repeat) Stakeholder Recommendation 15:* Analyze the most common Zendesk ticket questions and discuss with stakeholders the most common issues uploading forms to iConnect. Use the analysis to provide better training materials or updates to the portal.

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## ABOUT FLORIDA TAXWATCH

As an independent, nonpartisan, nonprofit taxpayer research institute and government watchdog, it is the mission of Florida TaxWatch to provide the citizens of Florida and public officials with high quality, independent research and analysis of issues related to state and local government taxation, expenditures, policies, and programs. Florida TaxWatch works to improve the productivity and accountability of Florida government. Its research recommends productivity enhancements and explains the statewide impact of fiscal and economic policies and practices on citizens and businesses.

Florida TaxWatch is supported by voluntary, tax-deductible donations and private grants. Donations provide a solid, lasting foundation that has enabled Florida TaxWatch to bring about a more effective, responsive government that is accountable to the citizens it serves since 1979.

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Kurt Wenner	Sr. VP of Research
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The findings in this Report are based on the data and sources referenced. Florida TaxWatch research is conducted with every reasonable attempt to verify the accuracy and reliability of the data, and the calculations and assumptions made herein. Please feel free to contact us if you feel that this paper is factually inaccurate.


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