



## **TIME SENSITIVE INFORMATION - Action Required**

### **Conflict Free Service Coordination**

On May 19, 2012, the Long-Term Living Home and Community Based Services regulation took effect. This regulation applies to all providers enrolled in the Aging, Attendant Care, COMMCARE, Independence and OBRA waivers and the Act 150 Program. Certain provisions of the regulation have delayed implementation dates, including provisions related to conflict free service coordination (SC). See § 52.28 of the regulation, which can be found in the May 19, 2012 of the *Pennsylvania Bulletin* at <http://www.pabulletin.com/secure/data/vol42/index.html>. The conflict free service coordination provision is anticipated to become effective on July 1, 2012 pending approval by the Centers for Medicare and Medicaid Services (CMS) of related waiver amendments.

Based on the regulation, all current Service Coordination Entities are required to make a decision to provide either SC or direct services. Due to time constraints involving systems changes and end of year activities, all agencies are required to submit the attached form relating to the choice of SC or direct services to OLTL **no later than Friday, June 15, 2012. Failure to provide OLTL with a completed form may result in a negative sanction being taken against you.**

All agencies are responsible for ensuring a smooth transition and continuity of services for all participants affected by these changes. Additional information and guidance will be provided by OLTL regarding the transition of participants in the near future.

This memo is being sent to all OLTL HCBS waiver providers, including Area Agencies on Aging. The Aging Waiver is covered by the new regulation and there are several AAAs that provide both SC and direct waiver services. AAAs will be required to adhere to the conflict free provisions of § 52.28. Additionally, because SC will be a service in the Aging Waiver instead of an administrative function, as of July 1 AAAs will be able to provide SC to participants in other OLTL waivers. Consequently, AAAs must complete and return the attached form by June 15, 2012.

May 21, 2012