

vi. If the common law employer authorized a qualified DCW to work hours above and beyond those approved in the service plan and the additional hours cannot be covered by a modified service plan/ budget, the VF/EA FMS organization will collect from the common law employer the total cost of those hours in excess of those approved in the service plan/budget. Total cost that must be collected from the common law employer includes the sum of gross wages plus the sum of employer taxes due on such wages, including Social Security, Medicare, State Unemployment and Federal Unemployment taxes.

vi. The VF/EA FMS organization must notify the AE of any such overages within five (5) business days of receipt of the involved time sheet.

13. Maintain copies of the filed IRS Forms 941, Schedule R and Schedule B and related correspondence in VF/EA FMS organization's file;

PPL will maintain IRS form 941, Schedules and related correspondence in PPL's files.

14. Deposit federal income tax withholding electronically (EFTS filing) in the aggregate using the VF/EA FMS organization's separate FEIN per IRS depositing rules;

15. Maintain copies of federal income tax withholding deposit documentation in the VF/EA FMS organization's file;

PPL maintains electronic records of all deposits in our financial management system and retains hard-copy records of all tax deposits in a secure location in the Chelsea, MA office.

16. Deposit FICA in the aggregate electronically (EFTS filing) using the VF/EA FMS organization's separate FEIN per IRS depositing rules;

17. Maintain copies of FICA deposit documentation in the VF/EA FMS Organization's file;

PPL maintains electronic records of all deposits in our financial management system and retains hard-copy records of all tax deposits in a secure location in the Chelsea, MA office.

18. Compute, withhold and file FUTA annually in the aggregate using the VF/EA FMS organization's separate FEIN and the IRS Form 940, *Employer's Annual Federal Unemployment (FUTA) Report, Schedule R, Allocation Schedule for Form 940 Filers and Schedule A, Multi-State Employer and Credit Reduction Information*, as appropriate;

19. Maintain copies of filed Form 940, Schedules A and R, as appropriate, and related documentation in the VF/EA FMS organization's files;

PPL stores electronic copies of Form 940 and related documentation on our secure network which can be accessed by authorized PPL staff.

20. Deposit FUTA in the aggregate electronically (EFTS filing) using the VF/EA FMS organization's separate FEIN per IRS depositing rules;

21. Maintain copies of FUTA deposit documentation in the VF/EA FMS Organization's file;

PPL stores electronic copies of FUTA deposit documentation on our secure network which can be accessed by authorized PPL staff.

22. Create a UserID/Password and register PA Employer Withholding Account Identification Number to electronically file returns and payments when using e-TIDES Internet Filing Systems at <http://www.etides.state.pa.us>;

23. Maintain copies of all documentation related to e-TIDES authorization for state income tax withholding in the VF/EA FMS organization's file;

PPL will maintain copies of documentation related to e-TIDES authorization on our secure network which can be accessed by authorized PPL staff.

24. Compute and withhold, at the current PA SIT tax rate, state income tax withholding for each common law employer's qualified DCW (resident or nonresident);

26. Maintain copies of state income tax withholding deposits and related correspondence in each common law employer's file;

Individual Forms PA-941 and related documentation will be maintained in PPL's files in a secure location.

27. File quarterly reconciliation of state income tax withholding withheld, including zero wages for each common law employer (resident or nonresident) electronically using the *e-TIDES Internet Filing System*;

Employer quarterly return of withholding tax, Form PA-W3 will be filed electronically using the e-TIDES Internet Filing System.

28. Maintain copies of quarterly reconciliation of state income tax withholding withheld and other related documentation and correspondence in each common law employer's file;

Copies of quarterly reconciliation of state income tax withholding withheld and related documentation will be maintained in PPL's files in a secure location.

29. File an annual reconciliation (along with the accompanying individual wage statements) for each common law employer (resident or nonresident) electronically using the e-TIDES Internet Filing System;

PPL will file an annual reconciliation (along with the accompanying individual wage statements) for each common law employer (resident or nonresident) electronically using the e-TIDES Internet Filing System.

30. Maintain copies of the annual reconciliation (Form REV-1667 and/or other appropriate documentation) and related correspondence in each common law employer's file;

Copies of the annual reconciliation and related documentation will be maintained in PPL's files in a secure location.

31. File for and receive authorization from the PA Department of Labor and Industry to file state unemployment taxes electronically through the Pennsylvania Unemployment Compensation Management System (UCMS);

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32. Maintain copies documentation related to UCMS for state unemployment insurance taxes in the VF/EA FMS organization's file;

Copies of documentation related to UCMS for state unemployment insurance and related documentation will be maintained in PPL's files in a secure location.

33. Determine if any common law employer's qualified DCWs are family employees that are exempt from filing and paying state unemployment insurance taxes and process accordingly;

PPL collects information relating to DCWs who are exempt from state unemployment insurance taxes during the DCW enrollment period. Each employment packet contains an individual employer/DCW Relationship Federal Tax Exemption Information Form which includes a short questionnaire to solicit if DCWs qualify for SUI exemptions.

34. Compute, withhold and file state unemployment insurance tax quarterly for each common law employer (even when zero wages are reported) using the UCMS;

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35. Maintain a report of wages paid and correspondence in calendar year for each common law employer's qualified DCW who are currently non-labile, in each common law employer's file;

A report of wages paid and correspondence for each common law employer who is currently non-liable will be maintained in the common law employer's file.

36. Deposit state unemployment insurance tax quarterly for each common law employer (including last filing even when zero wages are reported) using the UCMS;

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37. Maintain copies of state unemployment insurance deposits and correspondence in each common law employer's file;

Each individual employer's quarterly state unemployment insurance contribution is stored electronically in our financial management system. A physical copy of Form UI-3/40 will be stored in a secure location in the individual employer's files.

38. File state income tax withholding for non PA resident employees, (Form REV 420, *Employee's Statement of Non residence in PA and Authorization to Withhold State Income Tax*, and Form REV-419, *Employee Non Withholding Application*, and others as required), as appropriate;

PPL understands the statutory reciprocity requirements for withholding with neighboring (and some other) states. PPL will withhold according to the statutory withholding requirements, based on the information provided on forms REV-420 and REV-419.

39. Maintain copies of non PA resident employee state income tax withholding filings and correspondence in each qualified DCWs file;

Copies of non PA resident DCW state income tax withholding filings and related correspondence will be maintained in PPL's files in a secure location.

40. Deposit state income tax withholding for non PA resident DCWs, as appropriate and maintain copies of filings, payments and correspondence in each qualified DCWs file;

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of non PA resident DCW state income tax withholding filings and related correspondence will be maintained in PPL's files in a secure location.

41. Maintain copies of non PA resident DCW state income tax withholding payments and correspondence in each qualified DCWs file;

Copies of non PA resident DCW state income tax withholding payments and related correspondence will be maintained in PPL's files in a secure location.

42. File local earned income taxes (EIT) and local services taxes (LST), per the requirements of the jurisdiction;

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43. Maintain copies of the EIT and LST forms and any additional correspondence in each common law employer's and qualified DCWs file;

EIT and LSST forms and related correspondence will be maintained in PPL's files in a secure location.

44. Deposit local earned income taxes (EIT) and local services taxes (LST), per the requirements of the jurisdiction;

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45. Maintain copies of proof payments and any additional correspondence in each common law employer's and qualified DCWs file;

Copies of proof payments and related correspondence will be maintained in PPL's files in a secure location.

46. Reconcile the filing and payment local earned income tax withholding and applicable local services taxes for each common law employer, as required, using each locality's reconciliation forms, as applicable,

PPL will reconcile local earned income tax withholding in accordance with the guidelines of Act 32. Applicable local services taxes will be reconciled using the locality's reconciliation forms.

47. Maintain copies of local earned income tax withholding and applicable local service tax reconciliation forms and correspondence in each common law employer's file;

Copies of EIT and LSST reconciliation forms and related correspondence will be maintained in PPL's files in a secure location.

48. Process all judgments, garnishments, tax levies or other related holds on qualified DCWs pay as may be required by federal or state governments;

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49. Maintain copies of judgments, garnishments, tax levies, and other related hold documentation in qualified DCWs files;

Documentation of all payroll holds will be maintained in the DCWs' files in the Financial Operations Center. Policies and procedures will be updated to comply with any specific requirements of this project.

50. Generate and disburse payroll checks to all common law employers' qualified DCWs within the time period required by PA Department of Labor and Industry for each pay period (two consecutive work weeks);

51. Process direct deposit of qualified DCWs payroll checks as requested;

52. Maintain copies of direct deposit documentation in qualified DCWs files;

Copies of direct deposit documentation and related correspondence will be maintained in PPL's files in a secure location.

53. Develop a system for managing improperly cashed or issued payroll checks, stop payment on checks, and for the re-issuance of lost, stolen or improperly issued checks including:

- a. Maintenance of a log of voided and reissued checks, including all pertinent information;**
- b. Proper authorization of all stop payments and re-issuances; and**
- c. Timeframe for re-issuance of checks (i.e., within five (5) business days of notification of lost/stolen check) and issuance of stop payment request.**

54. Research and resolve any tax notices received from the IRS, PA Department of Revenue and PA Department of Labor and Industry regarding DCW tax liabilities/liens, including all pertinent information and step to resolution;

PPL researches and resolves all notices from tax agencies and maintains a database of notices received from tax agencies which contains all pertinent information with respect to the notices and the steps to resolution.

55. Maintain a spreadsheet of all tax notices received from the IRS, PA Department of Revenue and PA Department of Labor and Industry regarding DCW liabilities/liens including all pertinent information and step to resolution;

PPL researches and resolves all notices from tax agencies and maintains a database of notices received from tax agencies which contains all pertinent information with respect to the notices and the steps to resolution.

56. Process Department of Labor and Industry Reason for Separation Notice for direct care workers who no longer work for a participant within 10 days of receipt of notice;

PPL will process all Department of Labor and Industry Reason for Separation Notices within 10 days of receipt. PPL understands the importance of timely response and is prepared to comply with contractual obligations surrounding the timely response to separation notices.

K. End of Year Tax and Other Activities

1. Update common law employer and qualified DCW address or phone number changes prior to mailing out tax information in January each year;

PPL has designed a Change of Name/Address Form for providers to submit directly to PPL to report changes in names and addresses. For name changes, we request a copy of the DCW's Social Security Card as documentation of the new name. This information is used to update our system at the time of receipt to ensure that we have an accurate name and address for the DCW's payments as well as mailing out tax information in January. Changes in a direct care worker's phone number may be reported directly to a Customer Service representative to update immediately so that PPL has accurate contact information on file for the DCW.

2. Process refunds of over collected FICA for eligible common law employer (to DPW) and qualified DCW in accordance with IRS and OLTL/PDA/ODP directive;

PPL has a system in place including documented approved policies and procedures to refund over collected FICA to applicable DCWs and the eligible common law employer's portion of over collected FICA to DPW. Internal controls include monitoring of the FICA refund process and require the maintenance of the relevant documentation in our files. PPL will update these policies and procedures as necessary to comply with all of the Agreement requirements of this project.

On November 1st, or the nearest business day of each calendar year, PPL produces a report that identifies direct care workers who have yet to earn \$1,700 in wages for work performed for common law employers. In order to issue a direct care worker a FICA refund, PPL must have a current, verified address on file so as to exhibit due diligence per Federal and State regulations. To confirm mailing addresses, we send a letter to each direct care worker identified as earning less than \$1,700 as of November 1st. The letter notifies providers that they may qualify for a FICA refund and asks them to confirm their mailing addresses by completing the bottom of the form and mailing or faxing it to PPL by December 1st. The letter informs the DCW that if PPL does not receive a confirmed mailing address, we cannot issue a FICA refund. In this instance, the direct care worker can obtain the refund directly from the IRS upon filing their form 1040 for the calendar year, though.

Following the final pay period of the calendar year, PPL determines FICA refund amounts for all direct care workers with confirmed mailing addresses and less than \$1,700 in wages. We then deduct the total employee and employer FICA refund amount from the final weekly FICA and Federal Income Tax deposit of the calendar year. PPL refunds FICA to each DCW by mailing a check in January with a brief note explaining why they received the refund, which from our experience the direct care worker and his/her tax preparer find very helpful. The employer FICA refund portion is transmitted to DPW upon PPL's receipt of the refund proceeds from the IRS. PPL will coordinate FICA refund activities with DPW to support the department's quarterly CMS 64 reconciliation activities.

After all payments have been made to direct care workers, PPL reports FICA exempt wages on IRS Form 941 by adjusting Form 941 so that wages that make up the FICA exempt total for the calendar year are deducted from total program wages in the fourth quarter.

3. Maintain documentation related to FICA refunding in each applicable common law employer and qualified DCW file;

Documentation related to FICA refunding will be maintained in each applicable common law employer and qualified DCW file, or electronically through our Document Management system in the Web Portal.

4. Process, file and distribute IRS Forms W-2, Wage and Tax Statement for all qualified DCWs and in accordance with IRS instructions for agents. As part of this process, the total gross payroll per the Form W-2 should be reconciled to the calendar's gross total payroll;

PPL has policies and procedures that detail the processing, filing and distribution of IRS Form W-2 for all qualified DCWs in accordance with IRS instructions. In 2011, PPL issued more than 36,600 Forms W-2 and 1099-MISC as a payroll agent using IRS Revenue Procedure 70-6 and has documented procedures that detail the process for all year-end filings and W-2 distribution. Because the number of W-2s exceeds 250, all W-2 filing is done electronically. Our Financial Operations Center uses a tax reporting and payment processing schedule to ensure that all required tax and labor forms are systematically filed as required in a timely manner.

PPL calculates and prepares the required W-2 data using the payroll module of our financial management system, and have specifically customized this to file in accordance with IRS Rev. Proc. 70-6, Notice 2003-70 for household employers. Both paper and electronic copies of form W-2 are customized to automatically include agent name and address data in the "Employer" box and the individual employer data in boxes 15a and 15b, state withholding account no. This customization enables us to accommodate differences in federal and state W-2 filing requirements. W-2s are mailed to DCWs by January 31st.

Internal controls include procedures for electronic filing and require that the relevant documentation be maintained in PPL's files, as well as a management review. As part of this process, a PPL tax expert reviews a statistically valid sample of prepared Form W-2s and compares the data reported on each form to the data reported on the individual employer's behalf to the state and federal governments. This method allows PPL to efficiently capture a systematic reporting error. PPL will update these policies and procedures as necessary to comply with all requirements of this project.

5. Verify that each qualified DCW's social security number matches the name and date of birth information obtained from SSA's Business Services Online prior to submitting IRS Forms W-2 to SSA each calendar year;

As part of our standard operating policies and procedures, we verify that each qualified DCW's self-reported social security number (SSN) matches the name and date of birth information obtained from the Social Security Administration (SSA)'s Business Services Online (BSO) prior to submitting IRS Forms W-2 each calendar year.

Before providing services in the PDS programs, each DCW completes an employment packet. We then obtain the DCW's self-reported SSN on forms W-4, USCIS I-9 and any applicable state tax forms. Our separate agent FEIN is registered with BSO. PPL maintains an 8 character PIN, provided by BSO and a self-created password that must be changed at least once annually, and only specific staff members are authorized to verify DCW SSNs using the BSO Online Verification Service.

Weekly, staff members in the Financial Operations Center run a report in our financial management system that automatically creates a text file to BSO's SSN Verification Service file specifications, and the file is uploaded to BSO. Usually, within one business day, a results text file is received, listing failed SSNs and/or dates of birth (DOB). PPL uploads the file results into our Web Portal, such that our Customer Service Center has immediate access to DCWs flagged as having unverifiable SSNs or dates of birth. Direct care workers with verified SSNs and DOBs are flagged as such with a check mark in the 'SSN/TIN Verified' checkbox in the DCW module in PPL's Web Portal. Those with failed SSNs or DOBs remain unchecked. This tracking system allows us to produce a report of DCW SSN verification status as needed.

When issues are identified, an agent from our Customer Service Center places an outbound call to the direct care worker and notifies them of a problem verifying their Social Security Number. Rather than verify the SSN with an outbound call to the DCW, the Customer Service Representative identifies him or herself as a representative of the VF/EA FMS organization, leaves his or her name and an 800 number for the DCW to call back, such that the DCW can verify that the number provided is indeed that provided in program documentation. By leaving a number for the DCW to return the call, the DCW can verify that he or she is providing his or her SSN to a trusted source. This method has proven successful in our current projects.

A Customer Service Representative verifies the previously provided SSN and DOB with the DCW. If the SSN or DOB on file with PPL does not match that provided during the call by the DCW, we record the corrected SSN and DOB and resubmit the data to BSO. If, however, the SSN or DOB on file matches that provided by the DCW, the Customer Service Representative encourages the DCW to contact the Social Security Administration's local branch to correct or verify their SSN or DOB. The Customer Service Representative provides the DCW with a local number to reach the Social Security Administration. Details of all contact with the DCW are recorded in the Web Portal's Support Ticket module.

6. Maintain copies of the federal copy of Forms W-2 and related documentation in each qualified DCW's file;

Copies of Forms W-2 and related documentation will be maintained electronically through our Document Management System in each qualified DCW's file.

7. Process and file IRS Form W-3, *Transmittal of Wage and Tax Statement*, as appropriate (Note: If IRS Forms W-2 are filed electronically the IRS Form W-3 is not necessary);

PPL currently submits all Forms W-2 to the SSA and appropriate State Agencies in electronic formats; therefore it is not necessary to process and file IRS Form W-3. In the event of paper W-2 submittal, PPL has documented, approved policies and procedures and internal controls that detail each segment of our processes, including the preparation, filing, and distribution of IRS Form W-3. A payroll register is generated from our financial management database summarizing wage and tax information by common law employer and direct care worker. From this data file, PPL staff members generate the required W-3. PPL staff at the Financial Operations Center is assigned to generate and validate this report.

8. Maintain copies of IRS Form W-3, as appropriate, in the VF/EA FMS organization's file;

As indicated above, PPL currently submits all Forms W-2 to the SSA and appropriate State Agencies in electronic formats; therefore it is not necessary to process and file IRS Form W-3. In the event of paper W-2 submittal, PPL will maintain copies of IRS Form W-3 in the VF/EA FMS organization's file.

9. Process any returned qualified DCW payroll checks or vendor or small unlicensed provider payments in accordance with PA Unclaimed Property Laws; and

PPL will apply our existing procedures and tools to manage returned checks in accordance with PA unclaimed property laws. Our Unclaimed Property team will proactively conduct due diligence on open checks as early as one month after issuance. If the property owner cannot be located, PPL will perform formal due diligence procedures and issue letters. In addition we make outbound calls based on any new information received. Activities are documented with support tickets. Following due diligence, if the property owner is not located, PPL will compile a report per the PA Unclaimed Property law. Furthermore, PPL will work with DPW to simultaneously manage the CMS-64 requirement to report open checks that are dormant for six months as reconciling items and return the FFP.

10. Maintain copies of PA Unclaimed Property- related documentation in the qualified DCW's, vendor's or small unlicensed provider's file.

Copies of PA Unclaimed Property-related documentation will be maintained in the qualified DCW's, vendor's or small unlicensed provider's file, or electronically through the Document Management capabilities of the Web Portal. This documentation will also be maintained for purposes of CMS-64 reconciliation per our response to item 9 above.

1. Have written policies and procedures related to the completion of the tasks listed below;

2. Have written internal controls, including segregations of duties, related to the completion of the tasks listed below;

PPL has written internal controls that detail each segment of duties related to the completion of the tasks listed below. Upon award, we will customize our Policy and Procedure manual template to create DPW PDS Programs specific manuals that comply with all of the Agreement requirements. This manual will provide detailed policies, procedures, internal controls, and timeframes and will serve as the document that governs all tasks related to the processing and tracking of payments for approved participant-directed goods and services.

3. Receive, verify, process and pay all invoices:

a. For ODP administered waivers: from vendors and small unlicensed providers, providing participants-directed goods and services in accordance with the participant's authorized ISP; and monitor utilization against the participant's ISP;

b. For OLTL and PDA waivers and programs: from vendors providing participant-directed goods and services in accordance with the participant's authorized ISP and Spending plan; and monitor expenditures against the participant's Spending Plan

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9. File an applicable IRS Form 1096, when not filing the IRS Form 1099-Misc electronically, with the IRS and PA Department of Revenue and maintain copies of documentation in independent contractor's files.

PPL files all tax forms electronically thereby eliminating the need to file an IRS Form 1096.

M. Establishing and Maintaining Files and Documentation

The Selected Offeror(s) must:

1. Have written policies and procedures related to the completion of the tasks listed below;

It is PPL's standard operating practice to maintain a Policies and Procedures (P&P) Manual for each program; upon program implementation, PPL will create a P&P specifically for the maintenance and retention of DPW program documents in accordance with program and Agreement requirements including time frame for retention. Each P&P serves as a management tool and is incorporated into trainings for all DPW program specific financial operations and customer service staff.

2. Have written internal controls, including segregation of duties, related to the completion of the tasks listed below;

PPL will have written internal controls, including segregation of duties, to maintain all records and files pertaining to the DPW program. We will file each common law employer's record in an individual and clearly identifiable folder. All files, including those for common law employers, common law employers' direct care workers, vendors of approved goods and services, and vendor VF/EA FMS files will be stored in a secure and confidential manner.

The storage of the records will be in a location separate from other programs for which PPL provides financial administration. The physical documents will be in a secure space, and electronic copies of documentation are only available on PPL's secure server and used solely by individuals working specifically with the DPW program.

3. Establish and maintain current common law employer files in an accurate, complete, secure and confidential manner and for the required period of time as mandated by applicable federal, state and local rules and regulations.

PPL will establish and maintain for the required period of time all records and files pertaining to the DPW program. Our preference is to maintain files electronically through our Document Management System. Our Document Management System allows us to store all files on a secure, limited-access server. Electronic copies received via e-fax can be instantly moved to the secure server location and documents received via the United States Postal service can be scanned directly to this location. This server location is mapped to our Web Portal in order to make forms viewable through the Portal to authorized individuals.

The benefits of this system are accessibility, security, and efficiency. The consumer and direct care worker paperwork can be stored through each individual's ID number allowing accessibility to staff to quickly see which forms we have on file for people. If requested, this functionality can also be given to CM/SC, DPW staff, consumers, or direct care workers.

PPL's Document Management System allows for continuous back-up of the sever information protecting us against document loss, with access limited to authorized individuals it provides for stricter security than a filing cabinet. This system also provides efficiency by allowing PPL to drag and drop a file into a folder, which is less time consuming than paper filing, freeing up staff time to focus on enrollment, payroll processing, and issue resolution tasks.

If DPW prefers manual filing, we will physically file each common law employer record, their direct care worker, and vendor records in an individual and clearly identifiable folder. All files will be stored in a secure and confidential manner. The storage of the records described above will be in a location separate from other programs for which PPL provides Vendor Fiscal/Employer Agent Financial Management Services. The physical documents will be in a secure space, and electronic copies of documentation are only available on PPL's secure server and used solely by individuals working specifically with the DPW program.

The common law employer's file will be maintained in an accurate, complete, secure, and confidential manner; each file shall include, but not be limited to the following documents:

- Common Law Employer's name;
- Common Law Employer's address;
- Common Law Employer's phone number;
- Name, address and phone number of individual if he/she is not the common law employer;
- Participant's Medicaid Identification (MCI) Number;
- Participant's emergency contact person;
- Name, address and phone number for representative if he/she is not the common law employer;
- Completed Common Law Employer Enrollment Packet forms;
- Completed Qualified DCW Employment and Vendor and Small Unlicensed Provider Enrollment Packet form as outlined in section H; ISP and updates;
- ISP and updates;
- Copy revoked IRS Form 2678, IRS confirmation of IRS Form 2678 revocation and any related correspondence from the IRS, as applicable;
- Copy of letter retiring common law employer's FEIN, when applicable;
- Copy of IRS Form 8821 renewal (as applicable) and any related correspondence from the IRS, as applicable;
- Copy of IRS Form 8821 revocation (as applicable) and any related correspondence from the IRS, as applicable;
- Copy of PA Form UC-2B, Employer's Report of Employment Business Change, revoking individual's SUTA account number and Power of Attorney, when appropriate;
- Copy of PA DOR form REV-1706, Business Account Cancellation, when appropriate;

- Copies of all PA DOR Form PA-W3, Employer Quarterly Return of Income Tax Withheld (for remittance monthly, semi-monthly) including final return filed (even if its zero reporting) or copies of proof of filing if return filed electronically;
- Copies of the Form PA-501 Employer Quarterly Deposit Statement of Withholding Tax or copies of proof of filing if return filed electronically;
- Copies of all Forms PA REV-1667, (Annual Reconciliation) or copies of proof of filing if return filed electronically;
- SIT and SUI account numbers;
- Copies of documentation of all payments of SIT withholding or payment of receipt if payments are made electronically;
- Copies of filing and payments of income tax withholding for PA non residence employees, as applicable;
- Copy of Form UC-851, Notice of Pennsylvania Unemployment Compensation Responsibilities (provides the UC account number assigned as well as other UC tax information)
- Copies of form UC-657, Contribution Rate Notice;
- Copies of quarterly Form UC-2, Employer's Report for Unemployment Compensation, and Form UC-2A, Employer's Quarterly Report of Wages Paid to Each Employee or copy of proof or filing if return filed electronically;
- Copies of proof of payment of UC taxes for individual or payment receipt if payment is made electronically;
- Copies of all individual-specific state unemployment insurance benefits payments;
- Copies of the PA UC-2B, Employer's Report of Employment Business Change, when appropriate;
- Copies of registration of common law employer with local taxation authorities as an employer for purpose of locality tax filing and payment;
- Copies of all common law employer local earned income tax and locality tax filings, or copy of proof of filing if returned filed electronically;
- Copies of all common law employer local EIT and LST payments or payment receipts if payments are made electronically;
- Copies of documentation related to any FICA refunding (employer portion) processed and returned to eligible, qualified DCW;
- Copies of documentation related to any FICA refunding (employer portion) processed and returned to the State Treasury;
- Copies of workers' compensation insurance policies, premium invoices and documentation of payments, refunds and all notices and correspondence;
- Copies of completed workers' compensation (SWIF or other insurer's) audit reports, as applicable;
- Copies of Qualified DCW Termination Form;
- Documentation of any independent contractors used to provide goods and services for OLTL/PDA and vendor services and small unlicensed providers for ODP; and
- Documentation for transitioning the individual.

4. Establish and maintain current DCWs files in an accurate, complete, secure and confidential manner and for the required period of time as mandated by applicable federal, state and local rules and regulations.

PPL will establish and maintain for the required period of time all records and files pertaining to the DPW program. Our preference is to maintain files electronically through our Document Management System. Our Document Management System allows us to store all files on a secure, limited-access server. Electronic copies received via efax can be instantly moved to the secure server location and documents received via the United States Postal service can be scanned directly to this location. This server location is mapped to our Web Portal in order to make forms viewable through the Portal to authorized individuals.

The benefits of this system are accessibility, security, and efficiency. The consumer and direct care worker paperwork can be stored through each individual's ID number allowing accessibility to staff to quickly see which forms we have on file for people. If requested, this functionality can also be given to CM/SC, DPW staff, consumers, and direct care workers; and those individuals will only be able to see forms that they were authorized to view.

PPL's Document Management System allows for continuous back-up of the sever information protecting us against document loss, with access limited to authorized individuals it provides for stricter security than a filing cabinet. This system also provides efficiency by allowing PPL to drag and drop a file into a folder, which is less time consuming than paper filing, freeing up staff time to focus on enrollment, payroll processing, and issue resolution tasks.

If DPW prefers manual filing, we will physically file each common law employer record, their direct care worker, and vendor records in an individual and clearly identifiable folder. We will file each common law employer record, their direct care worker, and vendor records in an individual and clearly identifiable folder. All files will be stored in a secure and confidential manner. The storage of the records described above will be in a location separate from other programs for which PPL provides Vendor Fiscal/Employer Agent Financial Management Services. The physical documents will be in a secure space, and electronic copies of documentation are only available on PPL's secure server and used solely by individuals working specifically with the DPW program.

The qualified direct care worker's file will be maintained in an accurate, complete, secure, and confidential manner; each file shall include, but not be limited to the following documents:

- Common Law Employer's name;
- Common Law Employer's address;
- Common Law Employer's phone number;
- Name, address and phone number of individual if he/she is not the common law employer,
- Participant's Medicaid Identification (MCI) Number;
- Participant's emergency contact person;

- Name, address and phone number for representative if he/she is not the common law employer;
- Copy of the Qualified DCW Employment Enrollment Packet forms as described in section H;
- Copies of documentation verifying the employee's social security number matches the name and date of birth information provided obtained through the Social Security Administration's Business Service Online;
- Dates of employment for each qualified DCW;
- Copies of qualified DCW State Police Criminal Background, FBI Criminal History Clearance, and DPW Child Abuse History Clearance (as applicable) consent, forms (State Police Criminal Background Check Form SP-164 and PA DPW/OCYF Child Abuse History Clearance Form CY-113 and FBI Criminal History Clearance Form) and results;
- Determination of qualified DCWs state of residence;
- If worker is a non-PA resident, copy of Form REV-419, Employee's Non withholding Application and Form REV-420, Employee's Statement of Non residence in Pennsylvania and Authorization to Withhold Other State's Income Tax, as applicable and required;
- Copies of filing and payments of out-of-state income tax withholding, when applicable;
- Determination that the qualified DCW is a paid family member who is exempt from paying into FICA and/or FUTA per IRS Publication 15 and SUTA and documentation that applicable taxes have not been withheld and deposited;
- Copies of worker's time sheets;
- Copy of completed State New Hire Reporting documentation;
- Copies of documentation regarding any judgments, garnishments and tax levies or any related holds on the DCW pay as may be required by federal or state government;
- Copies of completed IRS Forms W-2 and W-2(c), as applicable;
- Copies of documentation regarding any FICA refunds processed (employee portion) and copies of cancelled refund checks;
- Copies of documentation of requests for verification of DCW wages requested by federal and state agencies, as applicable;
- Copies of documentation of any workers' compensation insurance claims filed by DCW or documentation that the VF/EA FMS made every attempt to obtain the documentation;
- Copies of documentation of submission of DCW returned/not cancelled payroll checks, FICA refund checks or any other payments due to the PA Department of Treasury, Bureau of Unclaimed Property;
- Copy of Qualified DCW Termination Form; and
- Copy of completed PA DL&I Reason for Separation Notice.

5. Establish and maintain current vendor and small unlicensed provider, including independent contractor files in an accurate, complete, secure and confidential manner and

for the required period of time as mandated by applicable federal, state and local rules and regulations.

PPL will establish and maintain for the required period of time all records and files pertaining to the DPW program. Our preference is to maintain files electronically through our Document Management System. Our Document Management System allows us to store all files on a secure, limited-access server. Electronic copies received via efax can be instantly moved to the secure server location and documents received via the United States Postal service can be scanned directly to this location. This server location is mapped to our Web Portal in order to make forms viewable through the Portal to authorized individuals.

The benefits of this system are accessibility, security, and efficiency. The consumer and direct care worker paperwork can be stored through each individual's ID number allowing accessibility to staff to quickly see which forms we have on file for people. If requested, this functionality can also be given to CM/SC, DPW staff, consumers, and direct care workers; and those individuals will only be able to see forms that they were authorized to view.

PPL's Document Management System allows for continuous back-up of the sever information protecting us against document loss, with access limited to authorized individuals it provides for stricter security than a filing cabinet. This system also provides efficiency by allowing PPL to drag and drop a file into a folder, which is less time consuming than paper filing, freeing up staff time to focus on enrollment, payroll processing, and issue resolution tasks.

If DPW prefers manual filing, we will physically file each common law employer record, their direct care worker, and vendor records in an individual and clearly identifiable folder. We will file each common law employer record, their direct care worker, and vendor records in an individual and clearly identifiable folder. All files will be stored in a secure and confidential manner. The storage of the records described above will be in a location separate from other programs for which PPL provides Vendor Fiscal/Employer Agent Financial Management Services. The physical documents will be in a secure space, and electronic copies of documentation are only available on PPL's secure server and used solely by individuals working specifically with the DPW program.

The vendor and small unlicensed providers, including independent contractor's file will be maintained in an accurate, complete, secure, and confidential manner; each file shall include, but not be limited to the following documents:

- Copy of the Vendor, Small Unlicensed Providers, and Independent Contractors Payment Packet forms as described in section H;
- Copies of invoices and receipts from vendors, small unlicensed providers, and independent contractors for authorized services rendered;
- Copies of payments made to vendors, small unlicensed providers, and independent contractors for authorized services rendered;

- Copy of potential independent contractor's completed Form SS-8, Determination of Worker Status for Purposes of Federal Employment Taxes and Income Tax Withholding and IRS worker employment status ruling letter, as applicable;
- Copy of independent contractor's IRS Forms W-9, Request for Taxpayer Identification Number and Certification; and
- Copies of the IRS Form 1099-M, Miscellaneous Income, when an independent contractor is paid \$600 or more in a calendar year.

6. Establish and maintain current VF/EA FMS organization files in an accurate, complete, secure and confidential manner and for the required period of time as mandated by applicable federal, state and local rules and regulations.

As with all programs, PPL will establish and maintain for the required period of time all records and files pertaining to the DPW program and the Agreement. Our preference is to maintain files electronically through our Document Management System. Our Document Management System allows us to store all files on a secure, limited-access server. Electronic copies received via efax can be instantly moved to the secure server location and documents received via the United States Postal service can be scanned directly to this location. This server location is mapped to our Web Portal in order to make forms viewable through the Portal to authorized individuals.

The benefits of this system are accessibility, security, and efficiency. The consumer and direct care worker paperwork can be stored through each individual's ID number allowing accessibility to staff to quickly see which forms we have on file for people. If requested, this functionality can also be given to CM/SC, DPW staff, consumers, and direct care workers; and those individuals will only be able to see forms that they were authorized to view.

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If DPW prefers manual filing, we will physically file each common law employer record, their direct care worker, and vendor records in an individual and clearly identifiable folder. We will file all DPW VF/EA FMS organization files in a secure and confidential manner. The storage of the records described above will be in a location separate from other organizational program files for which PPL provides Vendor Fiscal/Employer Agent Financial Management Services. The physical documents will be in a secure space, and electronic copies of documentation are only available on PPL's secure server and used solely by individuals working specifically with the DPW program.

The DPW VF/EA FMS organizational file will be maintained in an accurate, complete, secure, and confidential manner; each file shall include, but not be limited to the following documents:

- Copy of executed administrative Agreement with DPW;

- Copy of all Provider Agreements as described in section IV-3 Requirements;
- Documentation regarding registration with the Pennsylvania Department of State to do business in the state;
- Documentation verifying financial viability as described in section IV-3 Requirements;
- Documentation regarding the IRS Form SS-4 to receive the VF/EA FMS organization's separate FEIN, FEIN Notification from the IRS and the retirement of the VF/EA FMS organization's separate FEIN, when/if applicable;
- Aggregate filings of IRS Forms 941 (federal income tax withholding and FICA [Social Security and Medicare]) with individual-level income tax withholding, Schedules R and Schedule B, IRS Form 941-X, as appropriate, and FICA filing back-up for each common law employer and qualified DCW;
- Aggregate payments of FICA and federal income tax withholding the individual-level tax payment back-up for each individual/representative/qualified DCW;
- Documentation of the receipt of aggregate FICA refunds and documentation on the individual-level related to FICA refunds (employers and DCW);
- Aggregate filings of IRS Forms 940 (FUTA) and Schedule R and the individual FUTA filing back-up for each common law employer;
- Aggregate payment of FUTA and the individual-level payment back up for each common law employer;
- All communications with federal, state, and local tax, labor and workers' compensation insurance and DPW, OLTL/PDA/ODP, CM/SCs, and AEs as applicable;
- Other documentation, as applicable; and
- Documentation related to transitioning a common law employer form one VF/EA FMS organization to another, as appropriate

7. Make all documentation and records pertaining to common law employer and qualified DCW and vendor, small unlicensed provider, and independent contractor including independent contractor available to participants upon request.

PPL has established procedures in which to ensure program documents, as permitted, are made available to consumers, direct care workers, and vendors. During program implementation we will work in collaboration with DPW to determine program documentation that, upon request, will be made available to common law employer, qualified direct care workers, and vendor, small unlicensed provider, and independent contractor. Upon the live initiation of the DPW program, copies of documents will be made available in PPL's Web Portal, secure electronic email, fax, or mail.

N. Processing a Common Law Employer's Change in VF/EA FMS Organization
The Selected Offeror(s) must facilitate any necessary changes in a common law employer's VF/EA FMS organization per the OLTL/PDA/ODP requirements.

PPL has extensive experiencing managing transitions that will allow us to facilitate any necessary changes in a common law employer's VF/EA FMS organization. We have documented, approved policies, procedures and internal controls that detail each segment of our processes, including the process of receiving common law employer and DCW records and information from an existing VF/EA FMS organization, as well as transferring common law employer and DCW records and information to another VF/EA FMS organization.

Transition from another VF/EA FMS organization

PPL has been able to leverage years of experience implementing and managing the transition of VF/EA FMS programs. Each transition uncovers several "lessons learned" from prior programs to ensure we are using industry best practices to provide the highest level of service to all individuals. We have transitioned 11 of our current programs from one or more local providers and public agencies, and provide our clients with the tools to expand their self-directed programs. For example, in 2006, PPL was awarded a contract to provide participant-directed F/EA services on behalf of the Commonwealth of Virginia's Department of Medical Assistance Services (DMAS). The program began with the transfer of nearly 1,400 participants from an existing DMAS program, and as of January 2012, PPL now supports over 10,000 consumers receiving self-directed services in VA. Our experience has enabled us to develop a Model Transition Plan and Self-Direction Transition Checklist. We use this to monitor and steer transition progress so that we are prepared for an agreed upon operational start date impacting consumers as minimally as possible.

Based on our experience launching and transitioning existing programs we recommend using a minimum 90-day implementation period, that allows consumers sufficient time to transition at the change in a calendar quarter, but are open to adjusting and reviewing this recommendation with DPW as required. We have experience transitioning self-directed programs of various sizes and recommend utilizing the time from contract award date through the start of the proposed transition period (9/1/2012-12/31/2012) to understand the current program policies and develop an outreach program to create a smooth transition for consumers/ common law employers. It has been our experience in each transition we have completed, that regardless of the size of the program, there are a number of critical systems and procedures that need adequate development and communication time for a smooth program transition.

Upon award, we propose meeting weekly with DPW as part of this implementation and transition period. During those meetings, we hope to:

- share program transition experience and lessons learned;
- confirm an agreed upon transition and communications plan;

- establish sub-groups to develop final business rules, program policies, a tax approach summary, enrollment packets; and,
- customize our self-direction transition checklist to the needs of the PDS programs.

PPL has well established systems and processes to support large-scale transfers of participants from one FMS to another. Please see **Part IV-5 Knowledge Receipt and Transition Plan** for a thorough description of our approach.

Ideally, preparation for transfer begins three to four months prior to contract expiration or termination. PPL proposes meeting weekly with all parties to kick-off the program transition.

During those meetings, we hope to:

- share program transition experience and lessons learned;
- confirm an agreed upon transition and communications plan; and
- customize our self-direction transition checklist to the needs of the program.

Our work plan will allow PPL, the Commonwealth, and the transferring F/EA to monitor and steer the transition progress so that PPL is prepared for an agreed upon operational start date impacting consumer/representative-employers as minimally as possible.

Transition to another VF/EA FMS Organization

PPL is appreciative of the need for a planned, detailed-oriented and orderly process. At the end of the Agreement, we will meet with the future contractor to review and transition all records, as necessary. Transitioning services from PPL to any future VF/EA FMS organization shall be conducted at least two weeks prior to the new contract start date, and we would recommend starting the transition at least three months before the new contract start date.

PPL can provide all electronic and hardcopy files, including information on common law employers and direct care workers including all necessary employment and tax information, as well as information on vendors, small unlicensed providers and independent contractors. Depending on the capabilities of the future contractor, PPL can provide the electronic information via consolidated data files, or scanned copies of all hardcopy files.

PPL commits to fully cooperating with DPW and the future contractor to negotiate the specifics of document retention and document transfer, comply with DPW instructions for the transfer of work, destroy or retain records as appropriate, and ensure staff retention during the transition phase. PPL will also assist in the resolution of any issues that may arise as a result of the transition.

O. Preparing and Submitting Required Reports

The Selected Offeror(s) must:

1. Have written policies and procedures related to the completion of the reports and project controls listed in IV-7;

PPL has invested significantly in industry leading technology to meet the reporting needs of current and future statewide program requirements. We are able to provide a wide array of reports to consumer-directed programs across the country due to our commitment to developing state-of-the-art technology platforms that are configurable to state and public agencies' goals, program eligibility requirements, and payment criteria. We have developed a comprehensive, fully integrated web-based system, the Web Portal, to meet the reporting requirements of DPW. As our system is fully owned and developed by PPL, our staff has a thorough understanding of the policies and procedures required to ensure that all reports and project controls are completed and issued in a timely manner.

2. Have written internal controls, including segregation of duties, related to the completion of the reports and project controls listed in IV-7;

As is our practice for all our programs, PPL will develop extensive internal controls unique to this program in order to produce and deliver the required reports and project controls listed in this RFA to the designated parties.

3. Prepare and distribute monthly, quarterly and annual reports to OLTL/PDA/ODP as specified by OLTL/PDA/ODP;

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4. Deliver OLTL/PDA/ODP reports via File Transfer Process (FTP) using DPW's e-gov application or other secure electronic file transfer process;

6. Inform the CM/SC of any participant who does not submit timesheets or invoices to the VF/EA for two or more consecutive payroll periods (one month or more) as evidenced by the VF/EA's documentation and results of OLTL/PDA/ODP survey of CM/SC;

Through our robust financial tracking system, PPL will inform the CM/SC of any participant that fails to submit timesheets or invoices for two or more consecutive payroll periods.

7. For those individuals exercising budget authority, generate monthly financial reports for and distribute to participants that report current monthly, quarterly and year-to-date the amount of participants' Spending Plan; wages, taxes and insurances paid; non-labor related payments processed and paid; and the total amount of the Spending Plan remaining.

P. Brokering Worker's Compensation Insurance for Common Law Employers

The Selected Offeror(s) must:

1. Have written policies and procedures related to the completion of the tasks listed below;

As a registered member with the National Council on Compensation Insurance, Inc. (NCCI), PPL has gained national experience as a VF/EA FMS organization in facilitating the procurement of workers' compensation insurance policies on behalf of common law employers in states where it is required. As such, we have been able to offer our clients competitive premium rates while working with insurance writers throughout multiple programs nationwide. This has been demonstrated in the Consumer Directed Attendant Support Services (CDASS) program in Colorado, an agency with choice program where we serve as the common law employer for program consumers. In this role, PPL worked to set up a group policy for all employees in a semi-monthly "pay as you go" payroll format for yearly payroll equaling up to \$50 million dollars in gross payments.

PPL has well-established, written policies and procedures to manage thousands of workers' compensation policies annually. These policies and procedures include instructions related to the completion of tasks listed below including: procuring and renewing worker compensation policies, setting up withholdings from consumers' budgets, managing worker compensation claims and supplying data to complete annual audits.

2. Have written internal controls, including segregation of duties, related to the completion of tasks listed below;

We also have written internal controls, including segregation of duties, related to the completion of the tasks listed below including: procuring and renewing worker compensation policies, setting up withholdings from consumers' budgets, managing worker compensation claims and supplying data to complete annual audits.

3. Manage the initial application and receipt of individual workers' compensation insurance policies for each common law employer;

PPL recently bound a national group Workers' Compensation insurance policy that allows us to offer workers compensation insurance for PDS at attractive rates with less administrative burden to our state clients and common law employers. This policy is currently in place in seven states. As a special group policy, initial applications and receipt of individual worker's compensation insurance policies for each common law employer are not required. There are no application fees and no minimum premium amounts. Premiums are based on a percent of actual DCW payroll. . Premiums are fixed annually to gross wages actually paid, not estimated, and electronically remitted to the carrier via a pay as you go process. All DCWs will be covered consistent with PA requirements. Employers are covered from the first date of paid service. PPL has a great deal

of experience working with brokers to administer premiums and monitor and managing claims experience.

In anticipation of award, PPL has contacted the current Worker's Compensation vendor in Pennsylvania to understand the current practice. If approved by DPW, we propose the following process:

- 1.) PPL will create a policy cancellation document that will be signed by the common law employer and our Power of Attorney.
- 2.) PPL will submit this documentation to the current insurance provider and receive a premium refund (prorated for months used).
- 3.) PPL will place refunds into a Worker's Compensation refund account for the client to cover premium payments under the new policy.

This approach proved successful for common law employers, program consumers, and the state client in a transition that we recently managed for the Kansas Department of Health and Environment Division of Health Care Finance WORK program.

4. Manage the renewal of individual worker's compensation insurance policies for each common law employer;

PPL will manage the renewal of the worker's compensation national group insurance policy on an annual basis; under this proposed model, we will not be required to renew individual policies for each common law employer.

5. Manage the payment of each common law employer's individual worker's compensation insurance premium;

As part of the national group policy, payments are conveniently made following each pay period using a "pay as you go" Web-based system that allows policyholders to pay their premium in installments based on actual reported payroll, rather than on an annual estimate. Our financial management system is setup to calculate the premium amount owed per common law employer based on their DCWs' gross payroll for that particular pay period. This amount is withheld from the consumer's budget and paid to directly to PPL's broker through the Web-based system described above.

6. Provide wage information to workers' compensation insurer(s) to determine qualified DCWs benefits, when requested;

When requested, PPL will provide wage information to the workers' compensation insurer(s) to determine qualified DCW's benefits.

7. Facilitate the SWIF (or any other worker's compensation insurer's) annual audit process, including hosting SWIF/ insurer staff on site, providing necessary documentation;

PPL will facilitate an annual audit process including hosting any staff on site and providing the necessary documentation. The national group policy and “pay as you go” format promotes quicker audits, and minimal year-end reconciliation which allows consumers to budget more accurately.

8. Maintain the following information related to worker’s compensation insurance in the common law employer’s file:

- a. Worker’s compensation insurance application and renewal documentation for each common law employer;**
- b. Worker’s compensation insurance policies for each common law employer;**
- c. Worker’s compensation premium documentation for each common law employer;**
- d. Qualified DCW’s wage documentation for determining worker’s compensation insurance benefits; and**
- e. Relevant worker’s compensation insurance audit related documentation for each common law employer.**

As part of our national group policy, there will not be any individual insurance applications, renewal documentation, policies, or premium documentation for each common law employer. Necessary information related to the group policy will be maintained on file at PPL. Qualified DCW’s wage documentation and payroll reports will be maintained for each common law employer to facilitate payment, claims processing and annual audits.

Q. Physical Plant, Equipment, Technology and Development, Implementation and Maintenance of Communications and Information Systems

The Selected Offeror(s) must:

1. Have written policies and procedures related to the completion of the tasks listed below;

PPL has approved, written policies and procedures related to enrolling providers including the completion of the tasks listed below. Upon award, we will customize our Policy and Procedures manual to create ones specific to the PDS programs that comply with all contract requirements. Each manual serves as a training and management tool, as well as a reference guide for each program.

2. Have written internal controls, including segregation of duties, related to the completion of the tasks listed below;

PPL has well documented internal controls, including segregation of duties, related to the completion of the tasks listed in this section and we will update these as necessary to comply with all the requirements of this RFA.

3. Have the physical plant location, size and equipment (i.e., including computer hardware and software) that is adequate to effectively operate as a VF/EA FMS organization;

Public Consulting Group (PCG), PPL's parent company currently has an office located at 2040 Linglestown Road, Harrisburg, PA 17110. If awarded, PCG will relocate to a larger office in Harrisburg to accommodate PPL managers and staff. This office will be about 6,500-7,000 square feet and will accommodate about 30-35 employees. In addition, PPL has the equipment and computer hardware and software necessary to effectively operate as a VF/EA FMS organization.

At all of PPL's office finalities, we deploy standardized server rooms and computing technology to enable VF/EA FMS operations. Policy requires that server rooms be secured with secure card key or key pad access and provisioned with uninterruptable power supply and climate control. The server room houses network switches, routers and firewalls which safeguard access to the data center, state of the art VoIP phone system, and office servers that provide domain control (for authorization of access to the network), print, file, and other services.

Internet access is routed by secure MPLS network connection to the corporate data center, which monitors and controls access to outside sites. Workstations are either desktops or laptops which are physically tethered by security cables. Workstations are purchased from a single vendor, and share a common operating system and operating software, so they may be provisioned quickly and, in emergency situations, used interchangeably. Access to files on workstations is controlled by Active Directory, so individuals are only able to access their own files on any machine. All machines are encrypted to prevent against unintended data exposure and run a current version of

virus protection software. Printers are accessed through the secure corporate network. MICR cartridges and check materials used for check printing remain locked away, except during use by authorized personnel.

4. Have the necessary technologies and accommodations in place adequate to effectively operate as a VF/EA FMS organizations

PPL has the necessary technologies and accommodations in place adequate to effectively operate as a VF/EA FMS organization. PPL has invested significantly in industry leading technology to meet the needs of current and future statewide program requirements. We are able to provide a wide range of services and supports to consumer-directed programs across the country due to our commitment to developing state-of-the-art technology platforms that are configurable to state and public agencies' goals, program eligibility requirements, and payment criteria. Public agencies are increasingly faced with the conflicting goals of providing more service flexibility and heightened financial accountability for a growing number of program participants. We have developed a comprehensive, fully integrated Web-based system, the Web Portal, to meet these goals. This system is fully owned and developed by PPL and additional software will not need to be purchased to support this program.

5. Have a Website that meets current Website accessibility standards and contains current and accurate information related to the VF/EA FMS function;

The PPL Web Portal allows for real time data retrieval and while customer service staff is well prepared to provide such information to consumers/common law employers and DCWs (as necessary), the Web Portal also creates an opportunity for program consumers/common law employers and DCWs to access information on their own. The portal is available 24/7 and through the use of a unique username and password each consumer will have immediate access to real time budget, timesheet and invoice data. DCWs will have access to the timesheets they have submitted and their processing status. The Web Portal is designed to follow all HIPPA and privacy regulations applicable to the data we manage. Consumers/common law employers only have access to their own accounts and their DCWs are not privileged to their employer's sensitive budget data. PPL's experience has aided us in the development of a customer friendly system which supports consumers in their goal to self manage and provides them with a tool to do so.

In addition to our standard software information systems, PPL has a current, live Website that provides information about our services that can be tailored to meet the requirements of this program (Please see <http://www.publicpartnerships.com>). We will leverage our experience providing Websites for existing programs to provide one for this program that includes the ability for individuals to obtain information about services provided through Public Partnerships as well as PDS policies and procedures. The site will enable users to download employment packet forms, pay schedules, timesheets, and tax forms.

PPL is currently assessing the required Website accessibility standards of this RFA, and will have them implemented by launch of the PDS programs if awarded.

6. Maintain a current operations computer database that ensure timeliness and accuracy of data entry and storage, and meets the needs to PDS and VF/EA FMS.

PPL will maintain a current operations computer database that ensures timeliness and accuracy of data entry and storage, and meets the needs of PDS and VF/EA FMS. Our document management system has proven to meet the needs of consumer direction programs currently under our management. This system allows PPL to proficiently and effectively manage the dozens of tax forms and other program documents often required by Federal, state and local tax and labor departments. We regularly watch for changes in regulations related to record retention and adjust our practices, if needed, to remain in compliance with those laws.

Our document management system is hosted on a secure server ensuring the safety of public health information and other customer demographic data. Only designated PPL employees and client-approved individuals are capable of accessing this system. The information stored on the server is routinely backed up by our IT infrastructure ensuring continuity of service and protecting against loss of information due to unforeseen natural events.

IV-5. Knowledge Receipt and Transition Plan. The Selected Offeror(s) must submit a current, detailed transition plan to the Commonwealth within five (5) business days of the start of the VF/EA FMS Organization Readiness Review period or as required by the Commonwealth. At a minimum, the transition plan must include a detailed plan for moving all waiver and state funded program participants currently using VF/EA FMS from the current VF/EA FMS organization to the Selected Offeror(s) effective September 1, 2012.

PPL will submit a current, detailed transition plan to the Commonwealth within five (5) business days of the start of the VF/EA FMS Organization Readiness Review period or as required by the Commonwealth. At a minimum, the transition plan will include a detailed plan for moving all waiver and state funded program participants currently using VF/EA FMS from the current VF/EA FMS organization to PPL effective September 1, 2012.

DRAFT TRANSFER STANDARDS CHART

Policy statement:		
Wages and taxes reported and paid by an FMSA cannot be retroactively transferred from Sending Provider to Receiving Provider. All wages paid under each \$500M agency period must be reported by the appointed FMSA. This coverage period cannot be changed as a result of consumer transfer. Errors and corrections for SP covered period must be reported by SP in subsequent quarters. SP remains responsible for reporting and payment of all wage and tax liabilities during coverage period consistent with standard FMSA procedures for a terminated consumer. RP is responsible for reporting and payment of all wage and tax liabilities as of start date of agency appointment consistent with standard FMSA procedures for new consumer. Additional tasks related to the transfer process are detailed below for <u>Federal & Commonwealth of PA</u> .		
Tasks	Current WPIEA FMS - Sending FMS Provider (SP)	New WPIEA FMS - Receiving FMS Provider (RP)
General		
Initiate Transfer as per PA DPW request	Review a requested transfer data on the PA Consumers Batch Transfer Form, sign off on readiness and forward to Receiving FMS Provider.	Request a meeting with the Sending FMS Provider to discuss details of the transfer: the format of the file, FTP site, contact persons etc.
Western Region - OLTJL and PDA Programs - date of Transfer - 1/1/2000 Central Region - OLTJL, PDA and Statewide COP Programs - date of Transfer 1/1/2000 Eastern Region - OLTJL and PDA Programs - date of Transfer - 1/1/2000 If the transfer takes place on the beginning of the calendar year, there will be NO WAGE TRANSFER	Upon receipt of transfer order from PA DPW, complete the FMS Provider Transfer Request/ Authorization Form ,Batch Transfer and forward the form with required Employment and Payroll records listed on the Form to RP within 10 business days. Prepare the file with the transferred data in the format agreed on with RP, and upload the file to the designated location (FTP site). Mail requested copies of the employment documents to RP. Accept acknowledgment of received transfer data from RP and retain a file	Sign the FMS Provider Transfer Request/ Authorization Form ,Batch Transfer and return a copy to Sending FMS Provider. Upload/transfered participants-employees, and Direct Care Workers and for SDN information and track payroll date (if applicable) to your system. Prepare enrollment and employment packets to all transferred consumers and employees and distribute them to obtain not transferable documents and PoAs.
Agree to 'ending old' /starting new' pay-period details. The mid-year transfer, preferably, should take place on of the 1st day of the calendar quarter, to avoid issues related to multiple quarterly tax filing.	Exchange information with the Receiving FMS provider regarding the pay-cycle, the last pay-period and the last payable you will pay for to Direct Care Workers and Contractors.	Establish pay-cycle, pay- periods and Pay Dates and communicate a new payroll calendar to transferring consumers. Ensure your starting pay-cycle is not overlapping workdates covered by the sending FMS provider
The PA transfers will take place at the beginning of the calendar year. The first pay period for the new FMS provider will be Dec 16- Dec 31st, if the client wishes to have payroll on semi-monthly cycle.	Ensure the last Pay Date is in Dec 2000 to avoid tax filing issues. Let the RP know what will be the last pay date you will pay DCW/SDN to clear all pending timesheets.	Send a new payroll calendar to all transferred consumers. RP will take responsibility for making payments for days worked after the date of the transfer within the current authorization. RP will pay to DCW/SDN on the bi-weekly pay cycle (or as per agreement requirements), and to agreement on weekly basis (or as per the agreement requirements). The first pay period covered will be from Dec 16th to Dec 31st, 2000. The first pay date will be in January 2001.
Establish ending date and starting date for the budget authorization	Reconcile consumer's authorized funds and return un-used balances back to the client	Establish a plan for receiving funds for partial monthly allocation to cover consumers expenses for the workdates submitted to RP
The first pay-period paid by the new FMS provider will cover part of the December 2000 Authorization. The Sending FMS Provider and RP will work transfer details with PA DPW at least one month prior to the date of the transfer. The authorization must be provided no less than 2 weeks before the first Pay Date scheduled by RP. PA DPW must split the authorization for workdates paid by two different WPIEA FMS providers accordingly.	Establish deadlines for the first reconciliation with the PA DPW and return un-cashed checks through the un-cashed property process	Establish a deadline and a form of receiving authorization for transferring Participants budgets. The PA DPW must provide RP with authorization for the transferred Participants for the remaining of the month of the transfer . The PA DPW must ensure that RP is properly reimbursed for all payments made against a valid authorization.
Exchange information regarding pending Direct Care Invoices	Forward a record of valid but unpaid bills and invoices to the Receiving Provider (RP)	Communicate and agree with the state (Commonwealth) on the reimbursement method for payments to Direct Care workers for old timesheets and invoices.
The Sending FMS provider with cooperation of PA DPW should resolve all outstanding pending timesheets issues prior to the transfer.	In order to minimize the administrative burden associated with late payments, as part of the transfer process, emphasize to transferring participants and their providers to manage their payroll fees accordingly to prevent pending payments due to insufficient authorization, and submit timesheets timely during the last month prior to the transfer. Notify participants, workers and vendors that their late timesheets and invoices must be submitted to RP for payment, after the date of transfer.	Obtain a clear instructions from the PA DPW in regards to reimbursement method for payments on old timesheets submitted after the transfer date. RP will pay for prior pay periods as needed as long as PA DPW has provided a valid authorization. PA DPW must ensure that RP is properly reimbursed for all payments made against a valid authorization.
Clarify how to handle corrections to prior payments	If there was an overpayment or underpayment reported after the transfer date, correct the payment in the affected quarter, and amend tax returns as appropriate. Notify the RP about the change to wages.	Update wage records in the corrected quarter for the proper YTD taxable wage evaluation

UNAF1 TRANSFER STANDARDS UNAF1

Policy statement:		
<p>Wages and taxes reported and paid by an FSA cannot be retroactively transferred from Sending Provider to Receiving Provider. All wages paid under each (360M agency period must be reported by the appointed FSA. The coverage period cannot be changed as a result of consumer transfer. Errors and corrections for SP covered period must be reported by SP in subsequent quarters. SP remains responsible for reporting and payment of all wage and tax liabilities during coverage period consistent with standard FSA procedures for a terminated consumer. RP is responsible for reporting and payment of all wage and tax liabilities as of start date of agency appointment consistent with standard FSA procedures for new consumer. Additional tasks related to the transfer process are detailed below for Federal & Commonwealth of PA.</p>		
Tasks	Current VP/EA FMS - Sending FMS Provider (<u>SP</u>)	New VP/EA FMS - Receiving FMS Provider (<u>RP</u>)
The Sending FMS Provider will ensure that all corrections are being done prior to the transfer.	If there was an overpayment or underpayment reported after the transfer date, correct the payment in the affected quarter, and amend tax returns as appropriate. Notify the RP about the change to wages. If the correction to payroll was requested after the account was reconciled and an additional payment will be required in the following calendar year, forward the request for this adjustment to RP.	Update wage records in the corrected quarter for the proper YTD taxable wage evaluation. If the correction to payment was requested by the Sending FMS Provider, work with PA DPM on the form of reimbursement for this additional payment, and make the requested payment to the worker.
Exchange information related to WC insurance	Send WC related information to the Receiving FMS Provider.	Establish a new communication with the current WC provider, and work details on payment schedules, reporting requirement, audit schedules, etc.
Sending FMS Provider will hand over all active WC policies to RP	Forward the current WC policies/terms, rates and WC agent name and phone number to RP. Inform the RP provider about any pending WC claims. Revoke Power of Attorney for all WC policies.	Send new PoAs to WC insurance, and re-establish new administrative responsibilities. Request a change of the mailing address for existing policies. Request a payment schedule, reporting requirements and audit schedules. Establish payment and reporting methods. Review pending claims.
Federal IRS		
Report Change of Address	Identify participants who may have recently changed the address of residency, on the CONSUMER INFO_BATCH TRANSFER FILE (see worksheet Consumer Info_Batch File).	Complete IRS Form 9622, Change of Address and process as appropriate. Retain copy in file. Request a new Certification Forms and update Work Location PSID Code
Provide documentation of Federal Employer Identification Number (FEIN)	Forward employer/ copies of IRS Notice CP 575 G, Assignment of Employer Identification Number to SP. Forward a list of EINs with Contractors and GoR Names on the CONSUMER INFO_BATCH TRANSFER FILE.	Verify accuracy of FEIN & retain copy of Notice CP 575 G, Assignment of Employer Identification Number, in consumer file. Upload Consumer-Employer-EIN info to your system.
Exchange information related to Direct Care Providers	Forward copies of available W-9s and I-9s to PPL. Forward a list of active Employees with their SSNs and addresses on the EMPLOYEES INFO_BATCH TRANSFER FILE	Save copies of W-9s and I-9s in the Employees file. Upload employees information to your system. Obtain missing documents directly from Direct-Care Workers
Exchange information related to Independent Contractors/Agencies	Forward W-9 forms for active Contractors and/or Agencies to RP.	Verify accuracy and keep W-9s in the Vendors/Contractors file. Upload Contractors info to your system. Obtain missing TIN directly from Contractors
Report change in agent status to IRS	Submit revocation of agent appointment on IRS Form 2878, Agent/Payer Authorization after you completed all tax filings for the tax periods of your responsibility	Submit new agent appointment on IRS Form 2878, Agent/Payer Authorization for all transferred consumers. Submit new Form 9921 Tax Information Authorization
Exchange information related to employer/employee tax liability for FICA/Medicaid and PUTA	If applicable, forward on the PAYROLL RECORDS BATCH TRANSFER FILE the relevant consumer and employee YTD gross and taxable wage information broken by calendar quarters for determination of employment tax liabilities. Indicate YTD wages paid to Independent Contractors and Vendors. On the CONSUMER INFO_BATCH TRANSFER FILE indicate if the Employer ever paid \$1000.00 in quarterly wages to his workers.	Record participants PUTA liability status and each attendant's FICA/Medicaid liability status. For attendants eligible for FICA/Medicaid withholding refund at date of transfer, notify <u>SP</u> if attendant subsequently exceeds the threshold prior to close of calendar year. Notify Sending FMS provider if independent Contractors wages met \$900.00 YTD threshold
Year-End Reporting	Issue Forms W-2 for each employee for all wages paid during agency period. Include wage and withholding information in aggregate W-3. Issue 1099 to Independent Contractors and Vendors	Issue Forms W-2 for each employee for all wages paid during agency period. (Do not include wages from period prior to transfer). Include wage and withholding information in aggregate W-3. Issue 1099 to Independent Contractors and Vendors.
Commonwealth of PA		
Provide information related to consumer's state unemployment and income tax withholding account	Where applicable, indicate consumer's unemployment compensation account number, unemployment experience rate, and state income tax withholding account number and filing frequency on the CONSUMER INFO_BATCH TRANSFER FILE. If no account number has been obtained because registration requirements are not met as the <u>SP</u> , file in aggregate, indicate "no account".	Upload SIT and SUI information to your system. Assess the need for additional registrations pursuant to RP policies and procedures for state registration.

DRAFT TRANSFER STANDARDS CHART

Policy statement:		
<p>Wages and taxes reported and paid by an RSEA cannot be retroactively transferred from Sending Provider to Receiving Provider. All wages paid under each (300M agency period must be reported by the appointed RSEA. The coverage period cannot be changed as a result of consumer transfer. Errors and corrections for SP covered period must be reported by SP in subsequent quarters. SP remains responsible for reporting and payment of all wage and tax liabilities during coverage period consistent with standard RSEA procedures for a terminated consumer. RP is responsible for reporting and payment of all wage and tax liabilities as of start date of agency appointment consistent with standard RSEA procedures for new consumer. Additional tasks related to the transfer process are detailed below for <u>Federal & Commonwealth of PA</u>.</p>		
Tasks	Current WFLA FMS - Sending FMS Provider (SE)	New WFLA FMS - Receiving FMS Provider (RE)
Exchange information related to employer tax liability for State Unemployment Tax	On <u>PAYROLL RECORD_BATCH TRANSFER FILE</u> , indicate relevant consumer and employee quarter-to-date wage information for determination of an employment tax liability. Based on the historical data, on the <u>CONSUMER INFO_BATCH TRANSFER FILE</u> indicate if the consumer is liable for SUT taxes (1000.00 = 1% quarterly payroll rate).	Record participant's SUTA liability status. For consumers who have not met the quarterly wage threshold for required filing of Form UC-2 at the time of transfer, notify SE if consumer subsequently exceeds the threshold during the calendar year of transfer. Notification should occur prior to the due date for filing Form UC-2 for the quarter during which consumer reaches the wage threshold.
Update Consumer's Power of Attorney	Revoke all applicable Power of Attorneys	Obtain a new PoA UC-884 and revoke the old one by executing a PA Form UC-280_Employer's Report of Employment and Business Change. Maintain copy of the Form UC-280
Reassign administrative functions in PA TIDES system	Upon receipt of signed FMS Provider Transfer Request/Authorization Form _Batch Transfer, use "Enterprise Maintenance" function in e-TIDES to reassign the administrative function to the RPL (see e-TIDES instructions for Enterprise Administration - RP must request access prior to reassignment). Remove banking and contact information prior to reassignment. <u>SE will File & pay final PAWC taxes using a Manual Return with check.</u>	Request administrative access to consumer e-TIDES account prior to receiving signed FMS Provider Transfer Request/Authorization Form _Batch Transfer (see "Registering Existing Enterprise" in e-TIDES instructions). Within five days of processing, confirm successful registration and/or correct any errors in coordination with SE. Update banking and contact information (Form UC-1435). RP will Register, File & pay PAWC taxes using the e-TIDES.
Provide information related to consumer's Local Income Tax withholding accounts	Forward to RP a copy of employee's Residency Certificate Form with appropriate Political Subdivision Codes (PSC) for both the residence and employment locations, and with the appropriate tax rates (ETT) for residents and/or non-residents. Forward to RP a name and the address of the Certified Tax Collector you have used for making Local Tax deposits to.	Record information received from Sending FMS provider. Request a change of address notification from all employees. Update records with new PSC codes. Assess the need for additional registrations pursuant to RP policies and procedures for Local Tax registration.
Share your contacts within state tax agencies with Receiving FMS provider. Because there is so many individuals to connect employment, having these relationships is invaluable	Provide the name and the phone number (e-mail) of the tax agents, you are dealing with.	Save the information and establish relationship with agents if needed.

Our work plan will allow PPL, the Commonwealth, and the transitioning F/EA to monitor and steer transition progress so that PPL is prepared for an agreed upon operational start date impacting consumer/representative-employers as minimally as possible.

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FMS Provider Transfer Request/Authorization Form

Batch Transfers

PCG Public Partnerships, LLC
6 Admirals Way
Chelsea, MA 02150

Sending VF/EA FMS Provider

Receiving VF/EA FMS Provider

Sending VF/EA FMS Provider should submit file batches via SFTP @

Consumer Records Include:

Batch File Headers

- ☐ Consumer ID No.
- ☐ Name
- ☐ Medicaid ID No.
- ☐ Address
- ☐ City
- ☐ State
- ☐ ZIP
- ☐ Municipality
- ☐ County
- ☐ PSD Code
- ☐ FEIN

Forms

- ☐ Authorized Surrogate Representative Designation
- ☐ Common Law Employer Agreement
- ☐ Residence Certification Form

EOR Records Include:

Batch File Headers

- ☐ FEIN
- ☐ Employer Registration Type
- ☐ EOR Name
- ☐ PSD Code.
- ☐ State SIT Account No.
- ☐ State SIT deposit frequency
- ☐ SUI/FUTA Liability Statement
- ☐ State SUI Account No.
- ☐ State SUI Experience Rate
- ☐ Workers Comp Policy No.
- ☐ Workers Comp Policy Rate

Forms

- ☐ IRS Form CP 575 G

Employee Records Include:

Batch File Headers

- ☐ Employee ID No.
- ☐ Employee Status: Employee | Contractor
- ☐ Social Security No.
- ☐ Name
- ☐ Residential Address
- ☐ Mailing Address
- ☐ State
- ☐ ZIP
- ☐ Phone No.
- ☐ Municipality
- ☐ County
- ☐ PSD Code
- ☐ Municipal Non-Resident EIT Rate

Forms

- ☐ IRS Form W-4
- ☐ IRS Form I-9
- ☐ Residency Certification Form
- ☐ DCW/SSW Qualification Form
- ☐ Qualified Backup DCW/SSW Designation
- ☐ DCW/SSW Backup Qualification
- ☐ Form W-9

SENDING VF/EA FMS PROVIDER

Authorized Signature

Submitted by (print name)

Date

RECEIVING VF/EA FMS PROVIDER

Authorized Signature

Submitted by (print name)

Date

IV.6 Agreement Transition and Turnover. Upon expiration or termination of the Agreement by the selected Offeror or by the Commonwealth, the selected Offeror shall provide for a smooth and timely transition of its services to the Commonwealth and its contractors, as applicable. In addition, the selected Offeror must:

- a. Provide a final detailed description of the transition plan for approval by the Commonwealth and initiated four (4) months prior to the last day of the Agreement.**
- b. Cooperate with the Commonwealth and supply the Commonwealth and/or its contractor with all information required by the Commonwealth and/or its contractor during the transition process.**
- c. Pay all costs related to the transfer of materials and responsibilities as a normal part of doing business with the Commonwealth.**

Upon expiration or termination of the Agreement by PPL or by the Commonwealth, PPL shall provide for a smooth and timely transition of its services to the Commonwealth and its contractors, as applicable. PPL shall cooperate with the Commonwealth and supply the Commonwealth and/or its contractor with all information required by the Commonwealth and/or its contractor during the transition process. PPL agrees to pay all costs related to the transfer of materials and responsibilities as a normal part of doing business with the Commonwealth.

PPL understands the importance of ensuring an efficient and effective transfer of FMS services and all related documentation at the end of each agreement or contract period. PPL will apply the same systems and process expertise we have developed to receive transferring participants to the transfer of participants to the Commonwealth and its contractors. These systems and processes are described fully in **Part IV-5 Knowledge Receipt and Transfer**.

We propose to meet with the Commonwealth immediately upon expiration or termination of Agreement to review the tasks on the work plan and their estimated start and end dates to ensure that all parties (PPL, the Commonwealth, and the transitioning VF/EA) are comfortable with the schedule and that no critical tasks have been overlooked.

IV-7. Reports and Project Control. Report formats and data sources must be approved by the Commonwealth Grant Administrator during the VF/EA FMS Readiness Review period. OLTL/PDA/ODP reserves the right to access pertinent data sources and generate ad hoc data reports. OLTL/PDA/ODP must have read only access to the accounting and information systems for validation of OLTL/PDA/ODP all data contained on OLTL/PDA/ODP reports and to perform ad hoc data queries. The VF/EA FMS organization must supply the Selected Offeror(s) Relationship Diagram to the Commonwealth Grant Administrator for facilitation of ad hoc reporting. If more than one Selected Offeror(s) is selected, the Commonwealth Grant Administrator will specify the data elements that the Selected Offeror(s) must have in their system for consistency in data and reporting.

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a. Quarterly and Annual Status Reports. The VF/EA FMS organization must submit quarterly status reports covering activities and issues encountered during the reporting period. The fourth quarterly report must be an annual progress report covering activities and issues of the past full Agreement year as well as recommendations for the next Agreement year. All figures should be presented by month, regional office, county, waiver or state funded program, and in the aggregate; additional categories apply for some statistics and are listed individually. Quarterly status reports must include:

i. The number of Education and Outreach activities performed;

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viii. For OLTL only, the number of individuals in SMW who stopped receiving VF/EA FMS from the VF/EA FMS organization. This number must also be presented by reason for termination;

x. For OLTL only, the number of individuals in SMW who previously stopped receiving VF/EA FMS from the VF/EA FMS organization, but then resumed services during the reporting period;

xiii. A description of issues identified by the VF/EA FMS organization which pose or may pose unnecessary barriers to or delays in the provision of VF/EA FMS. These issues may be systemic or specific to the business processes within one region or county;

PPL will report on issues that may pose barriers to or delays in VF/EA FMS. Our expectation is that if there are barriers or delays, these will largely take place during the implementation period as it is possible that we could have difficulty obtaining data from a transitioning VF/EA FMS or that we have misunderstood a DPW process. Any delays to DPW or vendor payment will be immediately reported; ongoing delays that may impact implementation will be discussed during regular status meetings as a part of our progress reports.

xiv. Updates on all work plans that are active during the reporting period;

Updates on all active work plans will be provided for each quarterly reporting period as well as our regular status meetings with DPW.

xv. The fourth quarter (annual) report also must contain:

a. Identification of any trends in the provision of FMS and an explanation of how both best practices and lessons learned will be acted upon;

In the annual report, PPL will analyze data accumulated throughout the year in order to identify both positive negative trends and provide detailed explanations on ways to improve our task and integrated best practices throughout the program further. Additionally, we will identify promising practices that we have learned in other states and bring them to the table for DPW discussion.

b. A summary of training opportunities offered to employees during the reporting period by the VF/EA FMS organization or third party training opportunities and the level of employee participation;

Training opportunities to employees and their participation rate will be documented and reported to DPW and other designated parties each year. We are excited that DPW recognizes that reporting trends can identify areas for training; not all of our clients make this request. We welcome any opportunity to streamline processes and make them more efficient and effective for the consumers and DCWs.

b. Monthly Reports. The VF/EA must provide accurate and timely reports monthly to common law employers, CM/SC, AE, and OLTL/PDA/ODP. All figures should be presented by month, regional office, county, waiver or state funded program, and in the aggregate; additional categories apply for some elements and are listed individually.

i. Prepare and distribute monthly utilization reports to common law employers, the AE, and the CM/SC as specified by OLTL/PDA/ODP;

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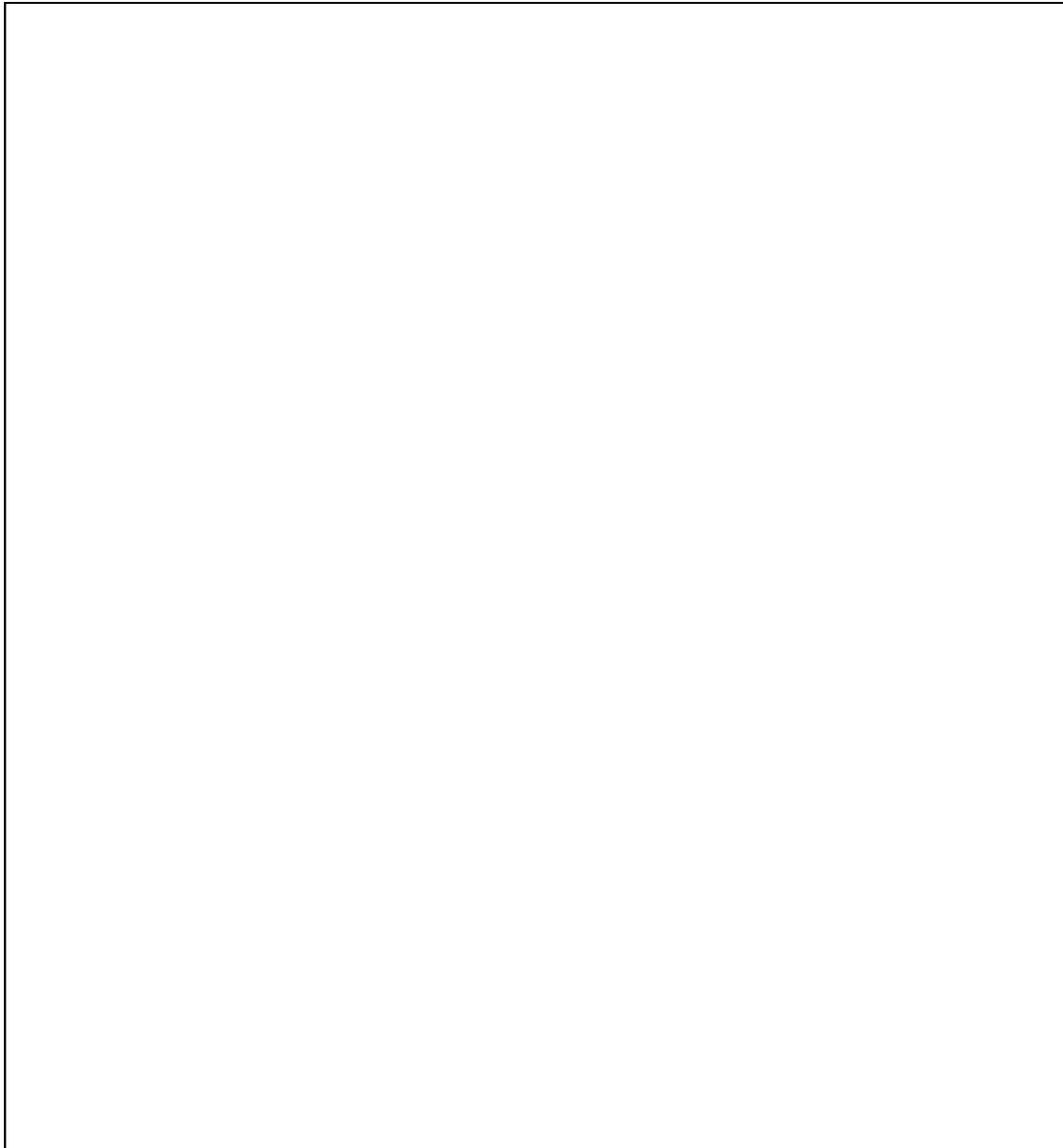
iii. Inform the CM/SC of any common law employer who does not submit timesheets or invoices to the VF/EA for two or more consecutive payroll periods (one month or more) as evidenced by the VF/EA's documentation and results of OLTL/PDA/ODP survey of CM/SC;

PPL will inform the CM/SCs of any common law employer who does not submit timesheets or invoices for two or more consecutive payroll periods.

iv. Common law employers, CM/SC, and OLTL/PDA are provided written notification of overutilization when utilization exceeds the monthly budget by 10% or more for two or more consecutive months. One letter is sent each month. This is evidenced by VF/EA documentation and OLTL/PDA/ODP review of sample of common law employer files;

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v. Common law employers, CM/SC, and OLTL/PDA are provided written notification of underutilization when utilization is 80% or less for two or more consecutive months. One letter is sent each month. This is evidenced by VF/EA documentation and OLTL/PDA/ODP review of sample of participant files;



vii. The VF/EA provides Common Law employer, DCW, vendor, or VF/EA related information, records, and statistics to OLTL/PDA/ODP within 10 business days of request;

PPL will provide the necessary information, records and statistics to the OLTL/PDA/ODP within 10 business days of request.

viii. The DCWs that are qualified to render services and the date of the last qualification determination;

ix. The consumers that have active authorizations for services;

PPL is able to generate a list of consumers that have active service authorizations on a monthly basis to the designated parties through our Web Portal Reporting web application. All data captured in our Web Portal are available for reporting.

x. Each DCWs hourly rate;

PPL is able to generate a monthly report specifying the hourly rate of each DCW to the designated parties through our Web Portal Reporting web application. All data captured in our Web Portal are available for reporting.

xi. Common Law employer relationship to DCW report;

PPL is able to generate this report on a monthly basis to the designated parties through our Web Portal Reporting web application. All data captured in our Web Portal are available for reporting.

xii. DCWs that have worker for 16 hour or more in a single shift;

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xiii. Each common law employers SUTA rate;

PPL will be able to generate each common law employer's SUTA rate on a monthly basis to the designated parties through our Web Portal Reporting web application. All data captured in our Web Portal are available for reporting.

xiv. Each DCW that is tax exempt;

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xvi. Outstanding payments or reimbursements from PROMISE™ to any DCW or vendor and the reason for the outstanding payment and the reason for not being reimbursed;

PPL will provide regular reports on any outstanding accounts receivable as well as denial reasons.

xvii. Requests for program exceptions based on established limits; and

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xviii. For ODP only, the common law employers that have paid overtime, the associated consumer, the amount of overtime paid, and the DCW that received the overtime payment.

In the monthly report, ODP will receive a list of common law employers that have paid overtime the associated consumer, the amount of overtime paid, and the DCW that received the overtime payment.

c. Problem Identification Report. An “as required” report, identifying problem areas. The report should describe the problem and its impact on the overall project and on each affected task. It should list possible courses of action with advantages and disadvantages of each, and include Offeror recommendations with supporting rationale.

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d. Final Report. The Vendor VF/EA FMS must submit draft copies of the final report prior to submission of the actual report. The final report will be due either at the end of the three year Agreement period, or at the end of any renewal year if a renewal option is exercised.

PPL will provide draft copies of the final report prior to the submission of the actual final report at the end of each applicable period.

The final report must include:

i. An abstract or summary of the VF/EA FMS activity during the Agreement period in terminology that will be meaningful to management and others generally familiar with the subject areas.

A summary of our activities during the Agreement period will be provided in the final report suited to an audience generally familiar with the subject matter.

ii. A description of data collection and analysis and other techniques used during the Agreement period.

The final report will include a description of our efforts and techniques in collecting data, as well as our analysis of the information on the PDS programs accumulated during the Agreement period.

iii. A summary of findings, conclusions and recommendations for improving the VF/EA FMS activities.

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iv. All supporting documentation; e.g., flow-charts, forms, questionnaires, etc.

All supporting documentations issued throughout the applicable period will be provided in the final report.

v. A time-phased work plan for implementing the recommendations.

Recommendations offered either by the DPW or issued by members of our own staff will include a time-phased work plan to ensure proper implementation.

2. Progress Reports.

The Selected Offeror(s) must prepare a written progress report by the tenth of the month or more frequently, as requested, and present this report to the Project Officer or designee.

PPL will present a written progress report by the tenth of each month, or more frequently, to the Project Officer or designee. PPL understands the importance of frequent and productive communication with our clients. It is standard protocol during a program launch to schedule weekly client steering meetings. These meetings serve as a platform for reporting progress, problems and required performance reports. We use the time to review progress against the project plan, identify accomplishments and areas in need of improvement and assign next steps for future action. Reports are an integral part of the meetings as we use them to analyze our actions, see trends and illustrate areas needing attention.

The report must include:

- a. Status of major activities and tasks in relation to the Selected Offeror(s)'s work plan.**
- b. Target dates for completion of remaining tasks.**
- c. Any potential delays or problems anticipated or encountered in reaching target dates and the reason for such delays.**
- d. Any revisions to the overall work schedule.**

PPL's progress reports will include the status of all major activities in relation to our work plan, targeted completion dates of all remaining tasks and information in regards to potential delays and/or any problems, anticipated or encountered, in reaching specified target dated. PPL's progress reports will also include reasons for any delays and the action plans for handling said delays. Revisions to the overall work schedule will also be included.

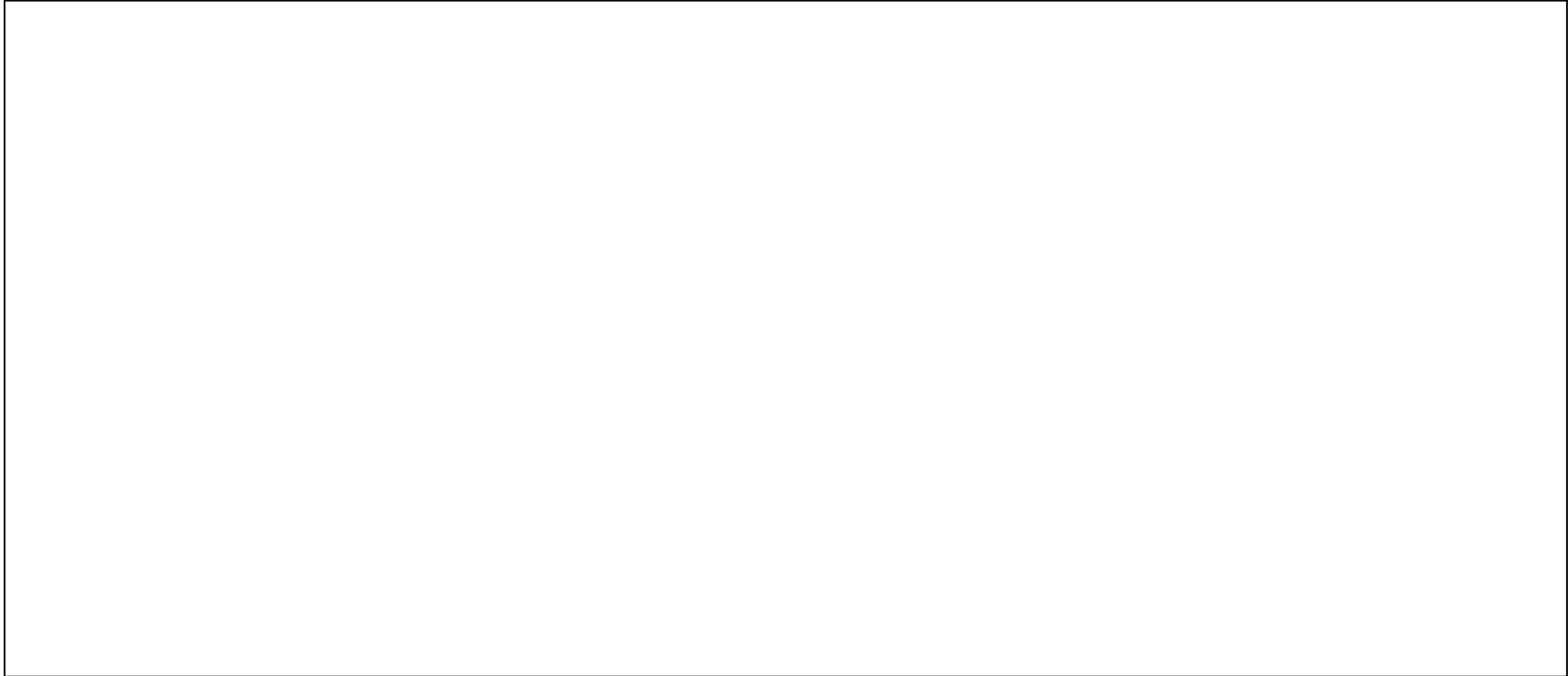
Below is a sample section of a PPL Progress Report for one of our South Carolina programs:

a. Corporate Background. The Offeror must describe the corporate history and relevant experience of the Offeror and any subcontractors. This section must detail information on the ownership of the company (names and percent of ownership), the date the company was established, the date the company began operations, the physical location of the company, and the current size of the company. The Offeror must provide a corporate organizational chart as part of this section. Offerors must identify any current contracting or subcontracting relationship(s) that may result in a conflict of interest with the requirements of this RFA. Offerors must also abide by the Commonwealth's conflict of interest standards identified in Appendix A, Standard Terms and Conditions for Services and Appendix B, Department of Public Welfare Addendum to Standard Terms and Conditions.


PPL agrees to abide by the Commonwealth's conflict of interest standards in Appendix A, Standard Terms and Conditions for Services and Appendix B, Department of Public Welfare Addendum to Standard Terms and Conditions. In the pages that follow, you will find PCG's and


PPL's organization charts. These organizational charts show PCG and PPL management. PPL's organizational chart also includes the various states in which we have contracts as well as the potential contact with Pennsylvania.

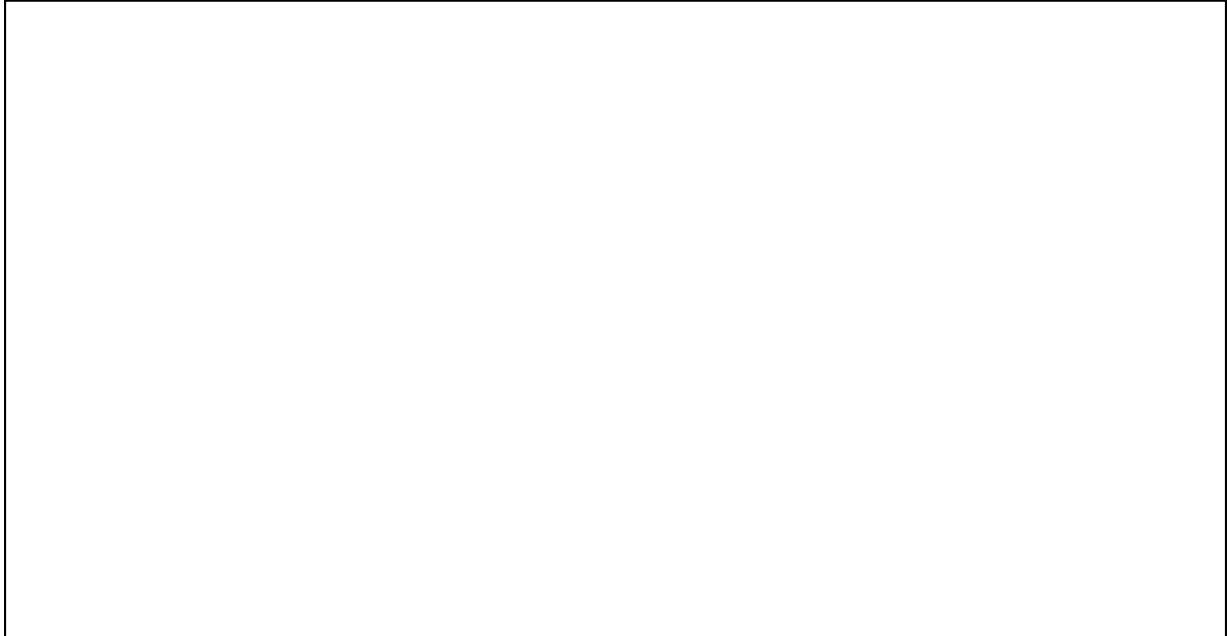
PCG Organizational Chart



PPL Orgnaizational Chart







We believe we are a well suited match for the PDS programs in the Commonwealth. Should PPL win this Award for PDS, PPL will be committed to the success of each program, in every region. PPL's mission is to be the provider of choice of comprehensive financial management for public sector home and community based services. Thus far, PPL has been able to successfully implement new programs, policies, and provide consumers with choice and control of publicly-funded long term services and supports. We look forward to the Pennsylvania opportunity.

This extensive experience allows us to apply national best practices in our operational procedures and management practices. Please see the charts on the following pages for detail about our experience in different states, the populations we serve, and the services we provide.

Populations Served & Services Provided by PPI

PPL Current Experience Matrix

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ii. The Selected Offeror(s) must provide at least one reference from organizations to which it has provided similar services during the past five (5) years.

Please see section II-4, c for a copy of our references.

iii. The Selected Offeror(s) must have a working knowledge of VVF/EA FMS as described in this RFA, including the need for VVF/EA FMS, the procedures and internal controls needed to provide VVF/EA FMS, and the scope/nature of VVF/EA FMS provided in accordance with Section 3504 of the IRS code, IRS Revenue Procedure 70-6, IRS Proposed Notice 2003-70 and REG-137036-08, as applicable, federal and state labor laws, state and local employment tax laws and state workers' compensation insurance laws.

PPL has well established internal controls and written policies and procedures to manage many

thousands of workers' compensation policies annually. These policies and procedures include instructions on procuring and renewing worker compensation policies, setting up withholdings from consumers' budgets, managing worker compensation claims and supplying data to complete annual audits. All policies and procedures identify the internal controls in place to monitor and evaluate these processes.



It is our belief that our experience over the past 12 years, combined with our size, national base and frequency of workers compensation facilitation and maintenance of policies, has put PPL in a position to negotiating competitive policy rates. Upon award of the Agreement, PPL looks forward to providing this same leverage on behalf of the families enrolled in the OLTL, PDA, and ODP programs, if required.

iv. The Selected Offeror(s) must meet VVF/EA FMS organization qualifications as outlined in OLTL Bulletin 54-541-10-03 and ODP Bulletin 00-08-14 and any Commonwealth revisions relating to VVF/EA FMS.

Since 1999, PPL has provided VF/EA services for individuals with a wide range of disabilities; we are the most experienced administrator of participant-directed programs in the country, having designed, launched, and managed numerous statewide and county-based fiscal service agency programs. PPL believes we will meet and exceed the VVF/EA FMS organization qualifications outline in the bulletins and in this RFA.

In accordance to OLTL Bulletin 54-541-10-03 and ODP Bulletin 00-08-14, PPL agrees to comply with all regulations. PPL has well established ongoing internal audits to ensure we are compliant with all program, state, and federal regulations. PPL also agrees to comply with all Standards and requirements outline in OLTL Bulletin 54-541-10-03 and ODP Bulletin 00-08-14 by developing policies and procedures that outline program requirements, development and implementation, and internal controls.

II-4 C: References

The Offeror must provide a list of at least one relevant Agreement within the past three (3) years to serve as corporate references. This list shall include the following for each reference:

- i. Name of contractor**
- ii. Type of Agreement**
- iii. Agreement description, including type of service provided**
- iv. Total Agreement value**
- v. Contracting officer's name and telephone number**
- vi. Role of subcontractor(s) (if any)**
- vii. Time period in which service was provided**

The Offeror must submit Appendix D, Corporate Reference Questionnaire, directly to the contacts listed. The references should return completed questionnaire in sealed envelopes to the Offeror. The Offeror must include these sealed references with its proposal.

Please find attached an overview of four relevant agreements outlining items i – vii listed above.

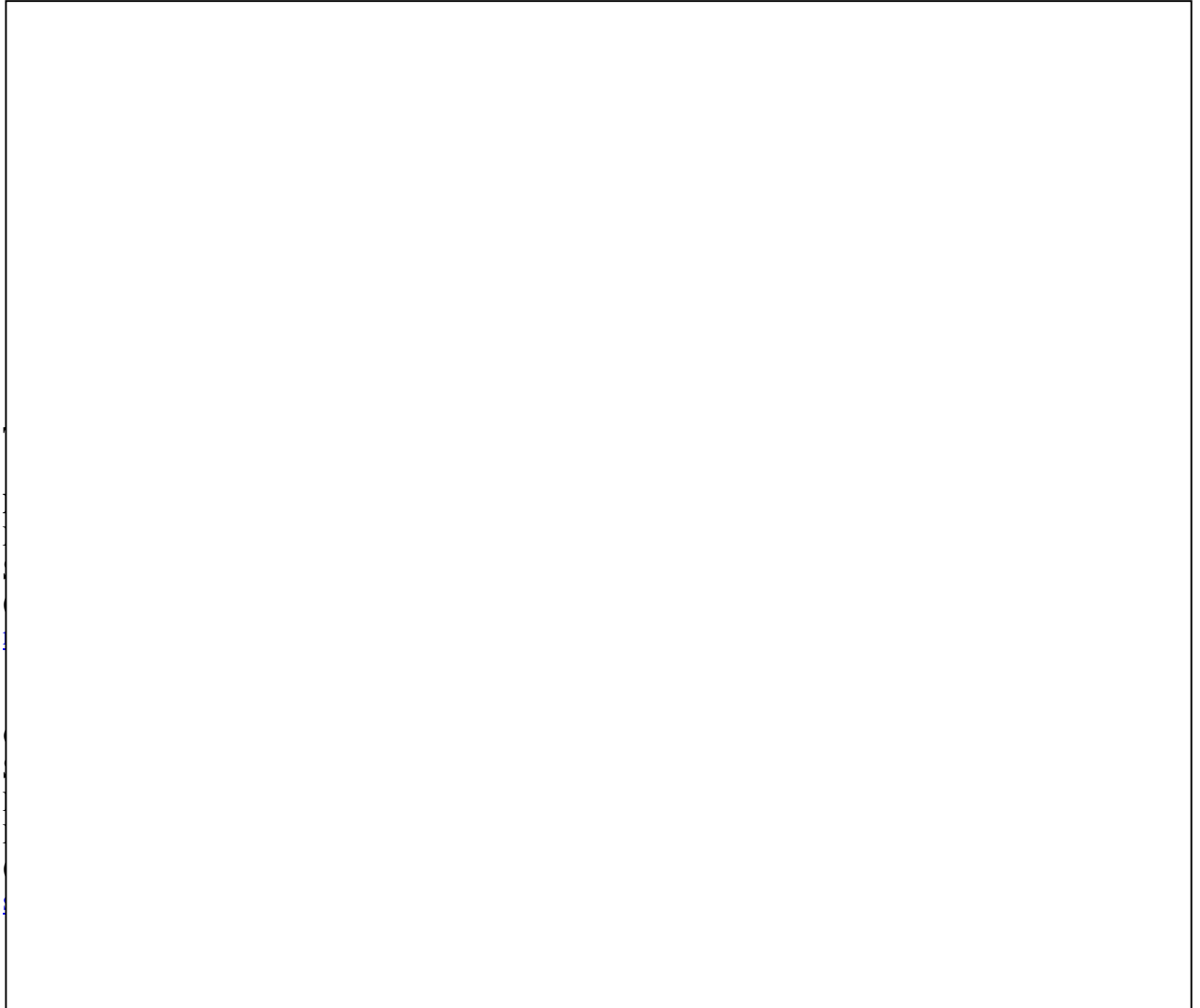
Please see envelope included with proposal. Submitted Corporate Reference Questionnaires for each reference are included.

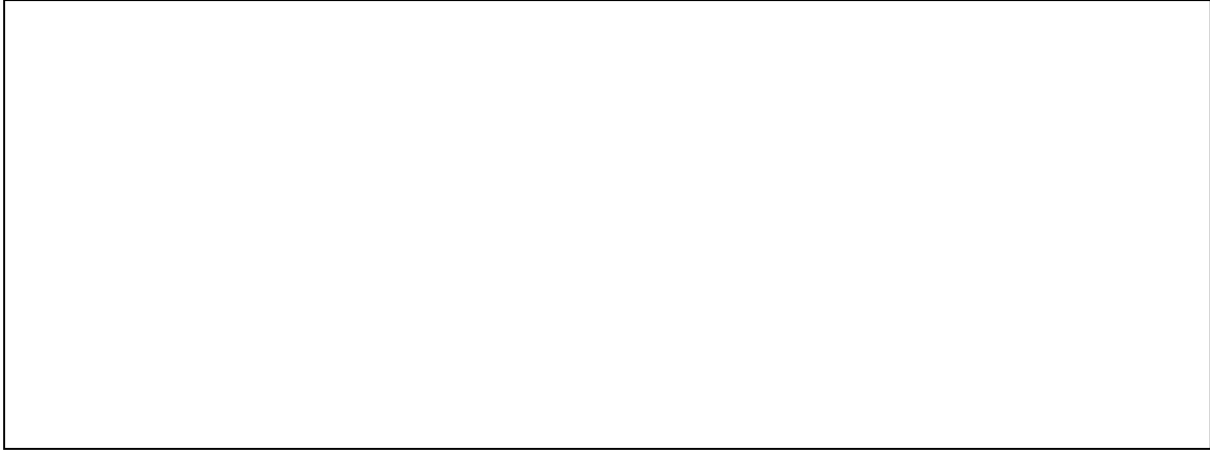
On the following pages, PPL has included a sample of our qualifications. Each qualification describes work we have done that is relevant to this proposal. The qualifications include a description of the program as well as contact information for our clients. We have also included a description of PPL's experience in Pennsylvania.

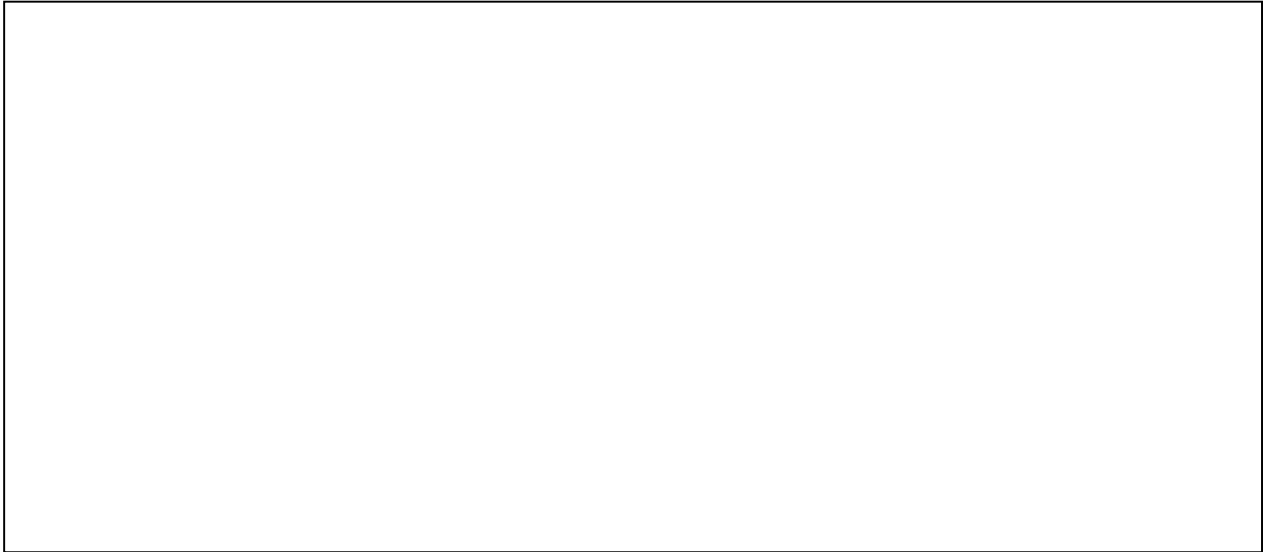
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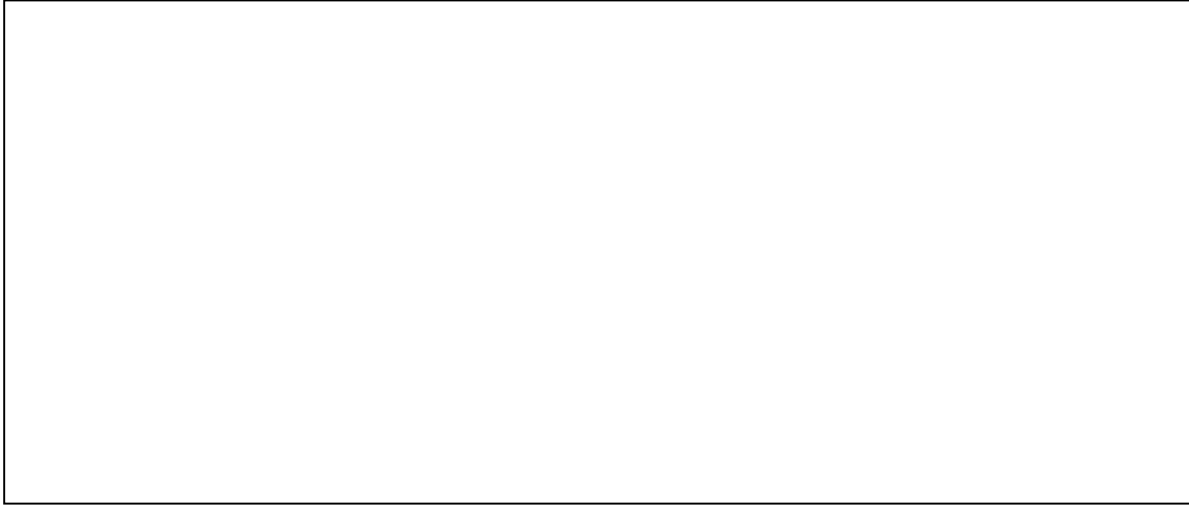
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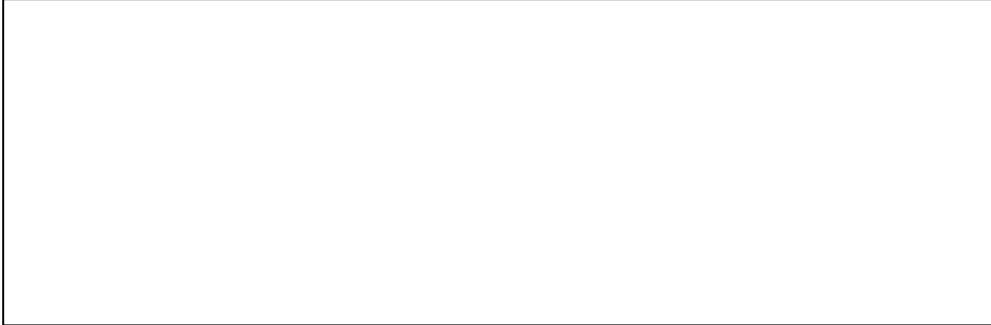
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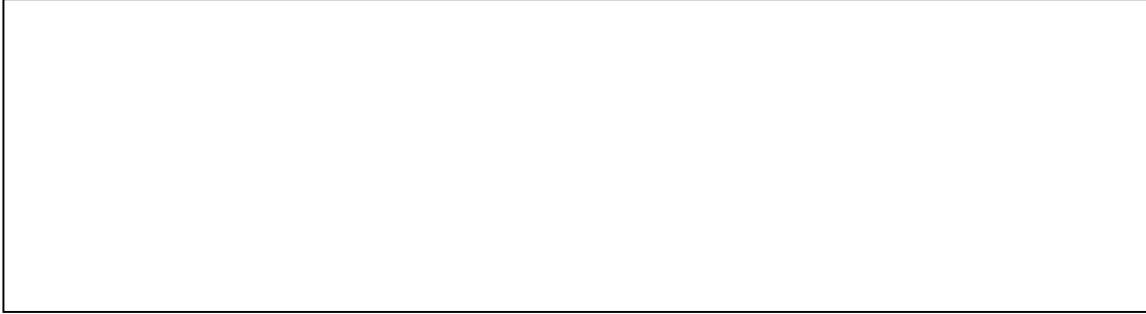


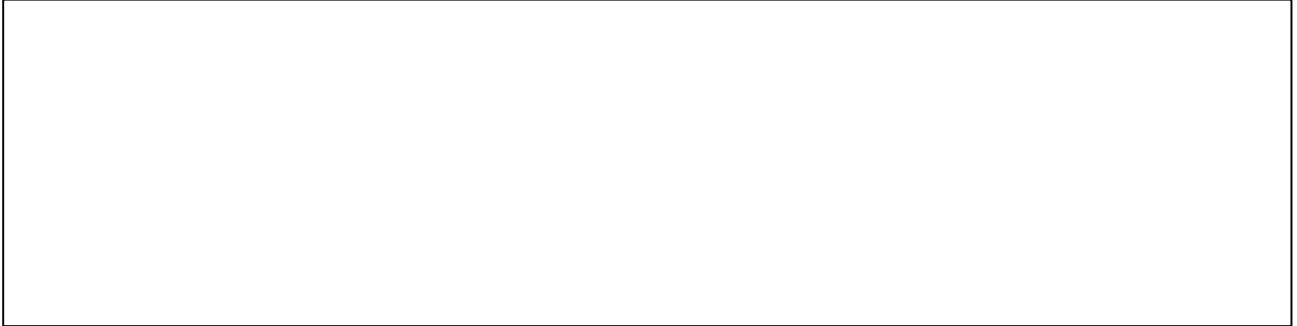






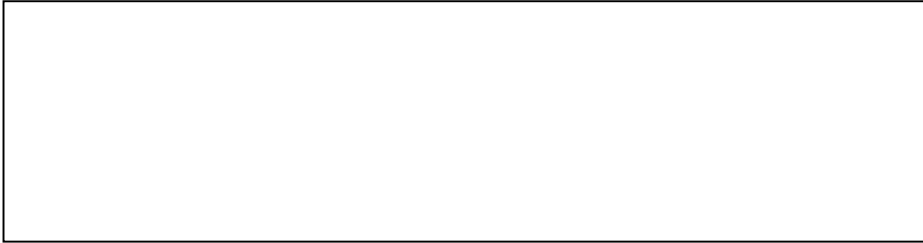


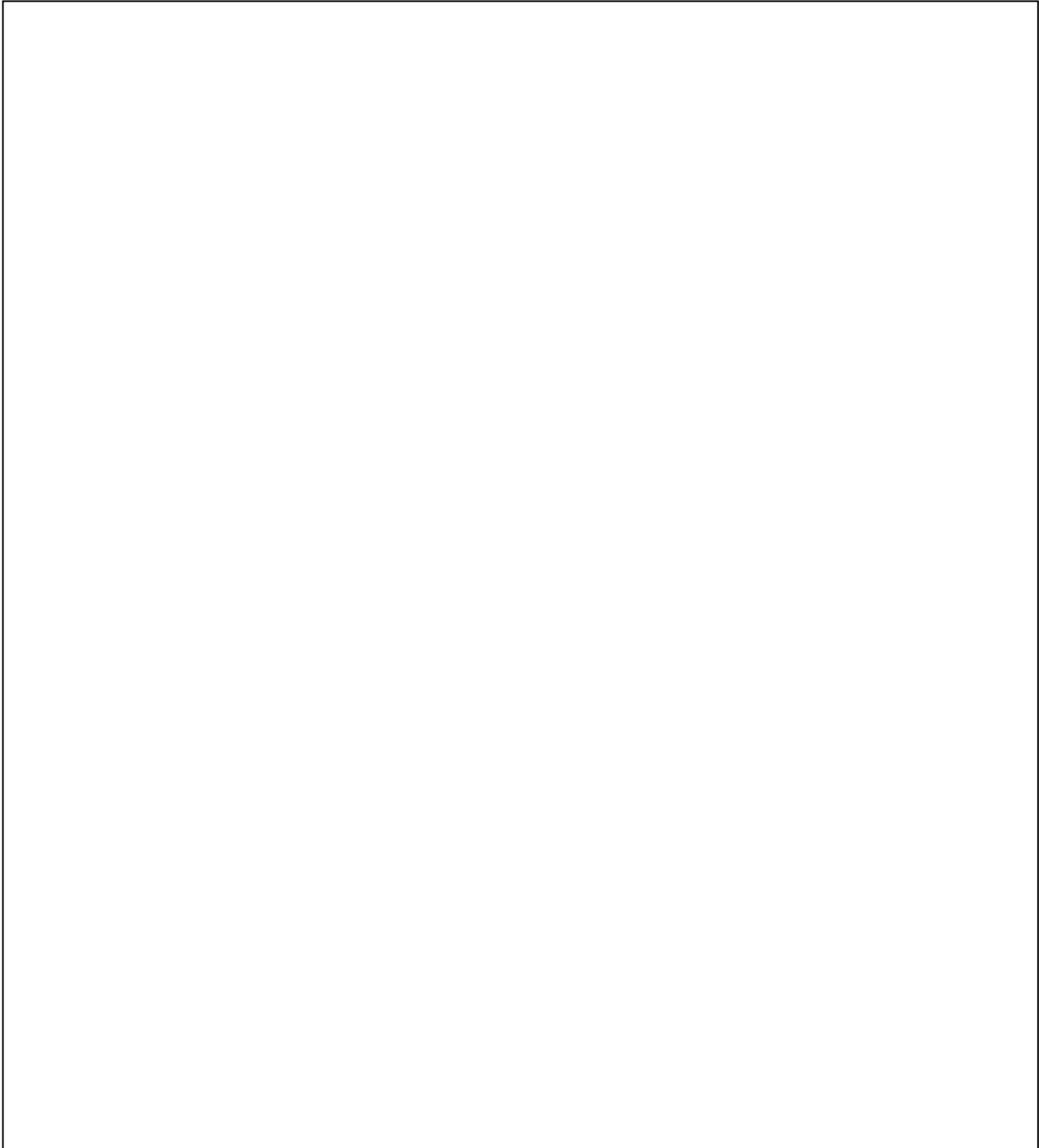


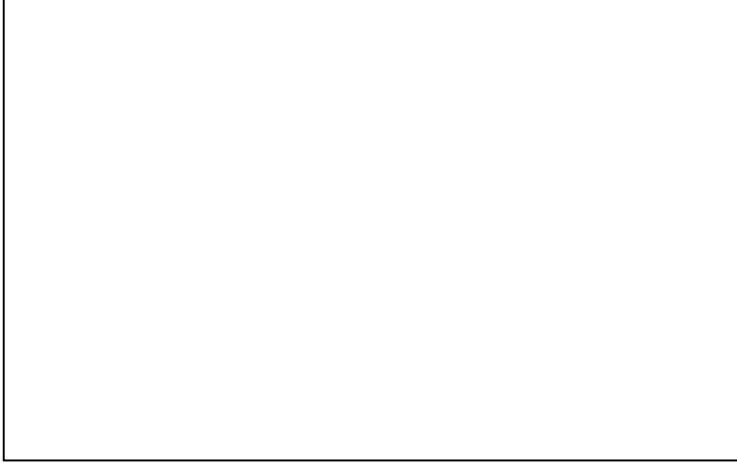


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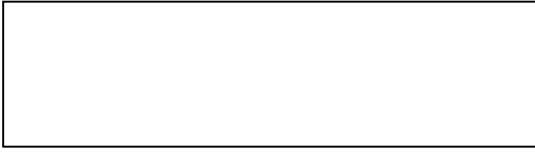
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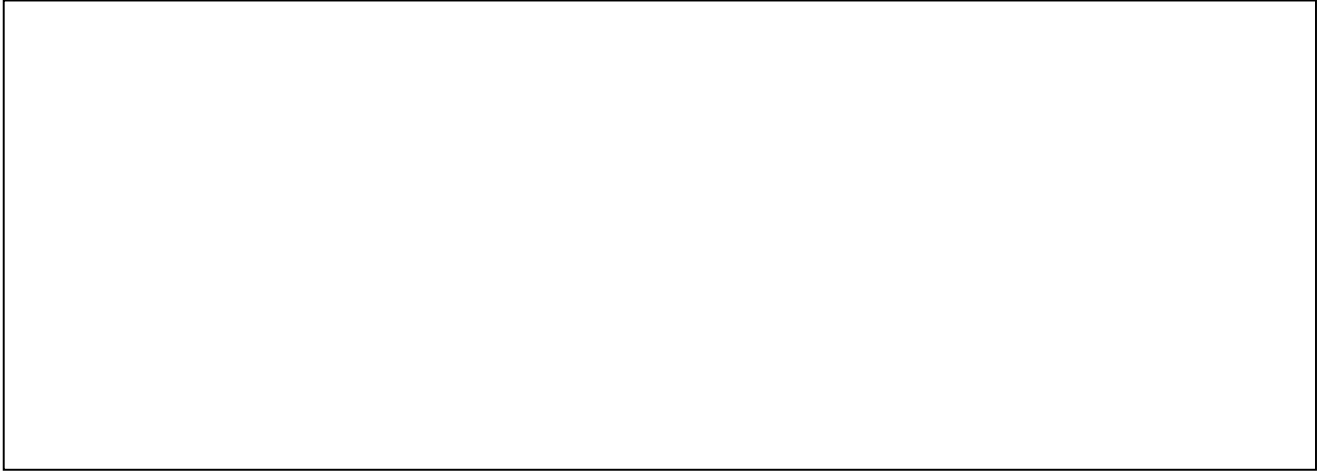
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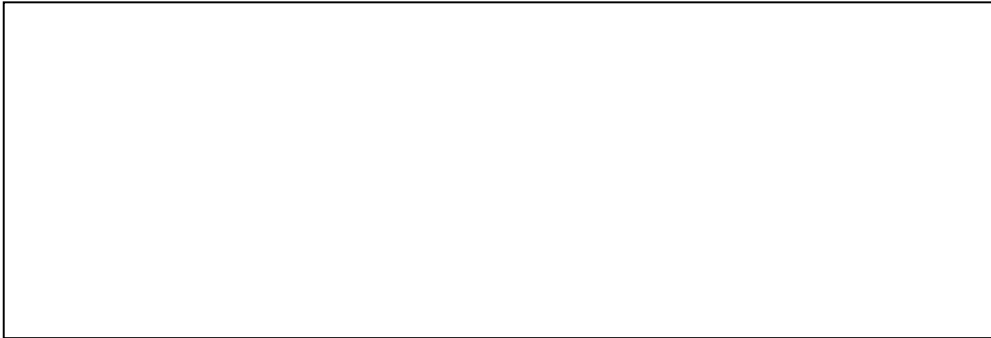
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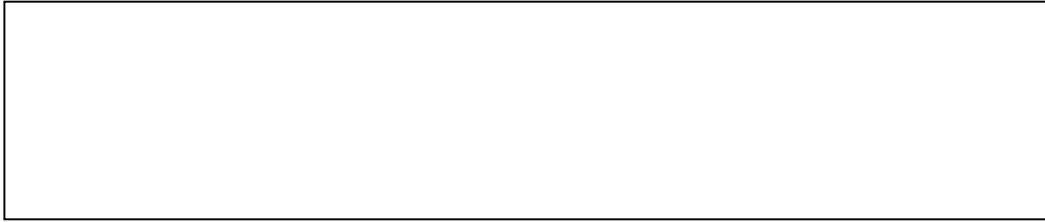
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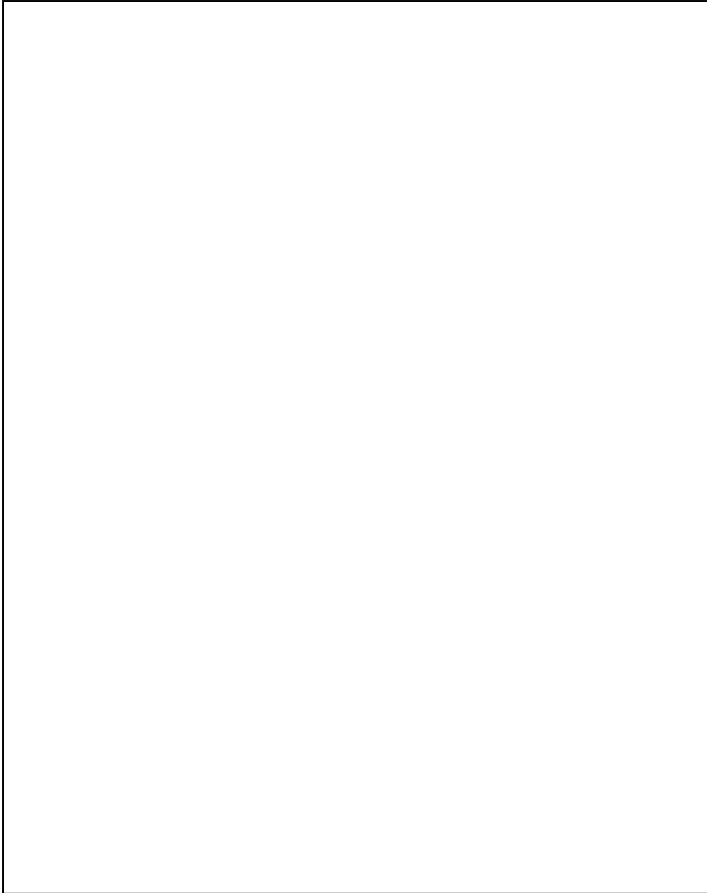














II-5. Personnel. Include the number of executive and professional personnel, analysts, auditors, researchers, programmers, consultants, etc., who will be engaged in the work. Show where these personnel will be physically located during the time they are engaged in the Project. For key personnel, include the employee's name and, through a resume or similar document, the Project personnel's education and experience in. Indicate the responsibilities each individual will have in this Project and how long each has been with your company. Identify by name any subcontractors you intend to use and the services they will perform.

PPL believes that one of the most important keys to a successful project is staffing it well. We employ curious, engaged and hardworking professionals around the country to support our consumer direction endeavors. The staff members assigned to this project represent multiple functional groups within PPL. These individuals possess the qualifications necessary to meet or exceed the requirements of these programs. Currently employing over 240 individuals, PPL has the ability to add additional staff rapidly and the bench strength to cover the peaks and valleys associated with such a large project. We believe that this, along with our demonstrated experience managing projects of comparable size, sets us apart from our competitors.

On the chart below we have identified the key staff who will be working on the PA DPW VF/EA FMS programs. These are all executive and professional-level staff; their work will be supplemented by supporting teams such as the Financial Operations Team, the Finance Team, the Launch Team, etc. The chart also identifies the state in which managers and staff will be physically located and how many years each person has been with PPL.

We have listed below the key personnel for PA DPW VD/EA FMS and their primary responsibilities:

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Resumes for all staff can be found at the end of this section.

PPL has not proposed to subcontract for any portion of the scope of work for this agreement. PPL retains the right to add additional staff and contractual resources to the project as required to support periods of intense activity and peak volume, such as during the initial transfer of existing participants from incumbent FMS organizations to PPL. If selected for award, PPL will present various alternatives for the review and approval of DPW.

II-6. Training. If appropriate, indicate recommended training of agency personnel. Include the agency personnel to be trained, the number to be trained, duration of the program, place of training, curricula, training materials to be used, number and frequency of sessions, and number and level of instructors.

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PPL also anticipates local, state and federal changes in rules and regulations over time that may require training of agency personnel. In those instances, we will try to add training to regularly scheduled meetings so that we do not inconvenience agency personnel.

II-7. Financial Capacity. Offerors must submit information about the financial conditions of the company. For ease in assembling the proposal, the Offeror should append its financial documentation rather than including it in the main body of the proposal. The Offeror must provide the following information:

a. The identity of each entity that owns at least five percent (5%) of the Offeror.

	of
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b. For the Offeror and for each entity that owns at least five percent (5%) of the Offeror:

i. Provide audited financial statements for the three (3) most recent fiscal years for which statements are available. If your company is a publicly traded company, please provide a link to your financial records on your company Website. Financial statements must include the company's Balance Sheet and Income Statement of Profit/Loss Statements. Also include Dun & Bradstreet comprehensive report if available. If audited financial statements are not available, explain why and submit unaudited financial statements.

a. The full name and address of any proposed subcontractor in which the Offeror has five percent (5%) or more ownership interest. The Offeror must provide a copy of the proposed subcontractor's Financial and Accounting Policies and Procedures.

PPL does not have any proposed subcontractors in which we have five percent (5%) or more ownership interest.

b. The full name and address of any organizations with which the Offeror proposes to subcontract for any tasks to be performed for the RFA and for administrative or related services.

PPL will not be using any subcontractors for this project if awarded this Agreement and plans to solely perform all tasks and administrative or related services described in the RFA and Agreement.

c. A list of any financial interests the subcontractor may have in the Offeror's organization or any financial interest the Offeror's organization has in proposed subcontractors.

PPL does not plan to use any subcontractors for this proposal and does not have any financial interest in any proposed subcontractors.

d. Information about any significant pending litigation.

Neither PCG nor PPL have any significant pending litigation.

Corporate Banking
28 State Street
MS1515

Boston, MA 02109
Telephone: 617 725 5673
Facsimile: 617 263 0442
david.bugbee@rbscitizens.com

February 13, 2012

Reference
Public Consulting Group, Inc.
148 State Street
Boston, MA 02109

To Whom It May Concern:


This letter will confirm that Public Consulting Group, Inc. is a commercial banking client of RBS Citizens NA. I have worked with Public Consulting Group for many years and they have always handled their relationship in an exemplary fashion.

Public Consulting Group, Inc. maintains a low eight figure deposit relationship with the Bank.

Overall, Public Consulting Group is an excellent customer to the Bank and we value our relationship.

Should you have any further questions regarding Public Consulting Group, Inc., please do not hesitate to call me at 617-725-5673.

Best Regards,


David Bugbee, CFA
Senior Vice President

II-8. Objections and Additions to Standard Grant Terms and Conditions.

PCG Public Partnerships has no objections to the Terms and Conditions outlined in Appendices A and B.

APPENDIX C
DOMESTIC WORKFORCE UTILIZATION CERTIFICATION

To the extent permitted by the laws and treaties of the United States, each proposal will be scored for its commitment to use the domestic workforce in the fulfillment of the contract. Maximum consideration will be given to those offerors who will perform the contracted direct labor exclusively within the geographical boundaries of the United States or within the geographical boundaries of a country that is a party to the World Trade Organization Government Procurement Agreement. Those who propose to perform a portion of the direct labor outside of the United States and not within the geographical boundaries of a party to the World Trade Organization Government Procurement Agreement will receive a correspondingly smaller score for this criterion. In order to be eligible for any consideration for this criterion, offerors must complete and sign the following certification. This certification will be included as a contractual obligation when the contract is executed. Failure to complete and sign this certification will result in no consideration being given to the offeror for this criterion.

I, **President of PCG Public Partnerships, LLC** a Massachusetts corporation or other legal entity,
("Contractor") located at **148 State Street Boston MA, 02109**, having a Social Security or Federal
Identification Number of **[REDACTED]**, do hereby certify and represent to the
Commonwealth of Pennsylvania ("Commonwealth") (Check one of the boxes below):

☒ All of the direct labor performed within the scope of services under the contract will be performed exclusively within the geographical boundaries of the United States or one of the following countries that is a party to the World Trade Organization Government Procurement Agreement: Aruba, Austria, Belgium, Bulgaria, Canada, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hong Kong, Hungary, Iceland, Ireland, Israel, Italy, Japan, Korea, Latvia, Liechtenstein, Lithuania, Luxemburg, Malta, the Netherlands, Norway, Poland, Portugal, Romania, Singapore, Slovak Republic, Slovenia, Spain, Sweden, Switzerland, and the United Kingdom

OR

☐ _____ percent (____%) [Contractor must specify the percentage] of the direct labor performed within the scope of services under the contract will be performed within the geographical boundaries of the United States or within the geographical boundaries of one of the countries listed above that is a party to the World Trade Organization Government Procurement Agreement. Please identify the direct labor performed under the contract that will be performed outside the United States and not within the geographical boundaries of a party to the World Trade Organization Government Procurement Agreement and identify the country where the direct labor will be performed:

The Department of General Services [or other purchasing agency] shall treat any misstatement as fraudulent concealment of the true facts punishable under Section 4904 of the Pennsylvania Crimes Code, Title 18, of Pa. Consolidated Statutes.

Attest or Witness:

Wm Wasaloon 3/21/12
Signature/Date

William M. Wasaloon / COO
Printed Name/Title

Public Partnerships LLC.
Corporate or Legal Entity's Name

Marc H. Fenton 3/21/2012
Signature/Date

Marc H. Fenton, President
Printed Name/Title

LOBBYING CERTIFICATION FORM

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with this federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure of Lobbying Activities, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed under Section 1352, Title 31, U. S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for such failure.

SIGNATURE: _____

TITLE: _____

DATE: _____

June 14, 2011

Daniel R. Boyd, Director
Department of Public Welfare Division of Procurement
Issuing Office at Room 402
Health and Welfare Building
Harrisburg, PA 17120

Re: RFA # 22-11 Vendor Fiscal/Employer Agent Financial Management Services

Dear Mr. Boyd:

Public Partnerships LLC (PPL) is pleased to provide a Technical Best and Final Offer (BAFO) for Request for Application (RFA) No. 22-11, Vendor Fiscal/Employer Agent Financial Management Services (VF/EA FMS) – Lot 1 Western Region. PPL's proposed BAFO reflects our commitment to working with PA DPW to ensure an effective transition and operation of the VF/EA FMS programs. We would be happy to discuss any aspects of this BAFO further, at a time of your convenience.

PPL understands that the Commonwealth has met with delays that have caused it to postpone transition activities, including the acceptance of new enrollees, from September 1, 2012 to October 1, 2012. With some modifications to our work plan, PPL is able to accommodate this change and still be able to provide services to both new and transitioned participants on January 1, 2013. We have attached a list and description of changes that are necessary and relevant to accommodate this schedule change. We have also provided a copy of our updated work plan, which details the modifications, as part of this BAFO. The biggest change is a more aggressive kick-off process with DPW shortly after contract award. We would hope to meet with DPW immediately upon contract award and use that time to meet your team, learn about the program's opportunities and challenges and make several tactical decisions with DPW about implementation.

PPL is committed to providing DPW with the most technically responsive and operationally sound financial management services possible. We look forward to the opportunity to further our work for the Commonwealth of Pennsylvania and would be honored to be selected to serve DPW as a VF/EA FMS.

We would be happy to present PPL's proposal in person at the convenience of DPW. Please do not hesitate to contact me if you require additional information in consideration and evaluation of the proposal or BAFO.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. H. Fenton', written in a cursive style.

Marc H. Fenton
President

List and Description of Changes to Work Plan and Project Management

On a macro level, the major changes to the Work Plan consist of moving the start date of activities from 7/1/12 to 8/1/12, shifting the start of enrollment of new participants commensurately by one month, but leaving the start of provision of services to transitioned participants per the original schedule, starting on 1/1/13. This has required the compression of many activities to complete required tasks on an accelerated basis. These revised timeframes are reflected on the updated Work Plan. The below identifies key changes to the Work Plan and our approach to managing these changes to mitigate implementation risk.

Phase I – Project Implementation Planning

The shorter transition timeframe increases the challenge of bringing on peak staffing requirements needed to process transition documentation and to provide customer service to respond to questions individuals have. PPL has pre-existing relationships established with staffing agencies and internal HR staff to help mitigate this risk.

Task I.1: Project Kick-Off

Work Plan Line Item 27: Kick Off Meeting

PPL is assuming a project start date of 8/1 and requests that DPW dedicate the appropriate staff to three full days of on-site meetings from 8/1 to 8/3 to review the project timeline, confirm expectations and bring as many open issues to closure as possible.

Work Plan Line Item 57: Participate in the F/EA FMA Organization Readiness Review

PPL will be prepared for the Readiness Review on August 15th and will need the DPW to commit the appropriate staff over the weeks leading up to the Readiness Review work with PPL to finalize a Business Rules and Process Flow document. The Business Rules and Process flow document will drive much of our system configuration and therefore it is imperative we have sign-off during the Readiness Review.

Work Plan Line Item 84: PA DPW Approvals

The truncated timeline will impact the transitioning population activities most dramatically given the number of participants. The key component of a well coordinated transition is ensuring that all necessary information is transferred in the timeliest manner possible. PPL requests that DPW dedicate the appropriate staff to work with PPL on finalizing and approving enrollment and transition packets and materials by 8/10 to allow immediate training of PPL staff on the processing requirements.

Work Plan Line Item 89: PA DPW Communications Plan for F/EA Transition

An effective Communications Plan is critical to ensure participants are aware of the transition and that they will be receiving information from PPL, and the criticality of promptly returning required documents back to PPL. To further ensure timely information transfer, PPL requests the appropriate DPW staff be assigned to finalizing a communication plan to participants and existing providers. PPL's ability to successfully transition program participants is highly contingent on current providers forwarding the necessary information on schedule.

PPL has transitioned participant-directed programs from other local providers in eight states and the best practice is for all information submitted by current providers to be in electronic format. Due to the truncated timeline, the high number of transitioning participants and the critical nature of payment processing and proper tax withholding and filing, we strongly recommend DPW support PPL in mandating that current providers submit all requested participant and worker information in electronic format.

Work Plan Line Item 115: Configuration of PPL Medicaid Billing Systems

In our experience, setting up PPL systems to interface with the Medicaid Billing platform (PROMISE) takes approximately 3 months to ensure appropriate testing has been completed prior to the first claim submission. Therefore, PPL will need the appropriate DPW IT and PROMISE staff assigned to the set up and testing process to ensure payments in October can be appropriately claimed through PROMISE.

Phase II: Project Design

Task II.1: IT systems and Web Portal System Set Up and Configuration

DPW has presented an aggressive schedule for program roll out and transition that will require PPL to prioritize our system configuration schedule to ensure payments can be made in October. Therefore, we request that DPW assign the appropriate staff over the first two months of program launch to provide any information or attend any meetings deemed necessary by PPL to ensure configuration of the Web Portal remains on schedule.

Work Plan Line Item 193: Reporting

PPL will work with DPW to identify the most relevant reporting metrics and prioritize development of those reports for commencement of FEA activities for new enrollees on 10/1. Completion of other quarterly and annual reports outlined in the RFA will be completed prior to the due date but will not be prioritized over completion of the other system configurations. As such, PPL can ensure prompt delivery of all mandatory reports in time to meet operational requirements.

Work Plan Line Item 233-234: Initiate Enrollment Activities for New Enrollees

Although the actual commencement of transition cannot start until 10/1, we highly recommend that critical activities, such as the Case Manager and Service Coordinator training, be conducted in advance of that date to ensure as much as possible is lined up prior to 10/1. We have reflected this on the revised Work Plan.

ID	Task Name		Duration	Start	Finish	Estimated Hours	Responsible Party	Resource Initials	July				August				September				October				November				December				January							
		i							6/17	6/24	7/1	7/8	7/15	7/22	7/29	8/5	8/12	8/19	8/26	9/2	9/9	9/16	9/23	9/30	10/7	10/14	10/21	10/28	11/4	11/11	11/18	11/25	12/2	12/9	12/16	12/23	12/30	1/6	1/13	
1	PA Department of Public Welfare VF/EA FMS Implementation Project Plan			124 days	Mon 7/2/12	Mon 12/31/12																																		
2	PA DPW - Lot 1 - Western Region			124 days	Mon 7/2/12	Mon 12/31/12																																		
3	Task I - Pre-Launch Activities			53 days	Mon 7/2/12	Fri 9/14/12																																		
4	✓📄	Secure at least one brick and mortar ADA compliant office in the Commonwealth	21 days	Mon 7/2/12	Tue 7/31/12		PPL	COO																																
5		Secure physical space capacity and equipment necessary to operate effectively as a VF/EA FMS organization	21 days	Mon 7/2/12	Tue 7/31/12		PPL	COO																																
6		Ensure workspace meets all Commonwealth requirements (including compliance with Commonwealth Desktop standards)	21 days	Mon 7/2/12	Tue 7/31/12		PPL	COO																																
7		Establish a regional presence with the capability to conduct in-person meetings	21 days	Mon 7/2/12	Tue 7/31/12		PPL	PM																																
8		Provide the Commonwealth evidence of the separate VF/EA FEIN for Public Partnerships, LLC	21 days	Mon 7/2/12	Tue 7/31/12		PPL	DFP																																
9		Register with the Pennsylvania Department of State	21 days	Mon 7/2/12	Tue 7/31/12		PPL	DFP																																
10		Register in the Commonwealth Workforce Development System (CWDS)	21 days	Mon 7/2/12	Tue 7/31/12		PPL	DFP																																
11		Establish a VF/EA FMS Organization File to include the following documentation	21 days	Mon 7/2/12	Tue 7/31/12																																			
12		Documentation regarding registration with the Pennsylvania Department of State to conduct business in the state	21 days	Mon 7/2/12	Tue 7/31/12		PPL	PM																																
13		Documentation verifying financial viability	21 days	Mon 7/2/12	Tue 7/31/12		PPL	PM																																
14		Public Partnerships, LLC IRS Form SS-4	21 days	Mon 7/2/12	Tue 7/31/12		PPL	PM																																
15		Other documentation as applicable	21 days	Mon 7/2/12	Tue 7/31/12		PPL	PM																																
16		Documentation related to transitioning a common law employer from one VF/EA FMS organization to another, as appropriate	21 days	Mon 7/2/12	Tue 7/31/12		PPL	PM																																
17		Ensure all current project staff have completed HIPAA Privacy and Security Training	21 days	Mon 7/2/12	Tue 7/31/12		PPL	PM																																
18		Recruit, hire and train additional support staff to support the roll out and transition	53 days	Mon 7/2/12	Fri 9/14/12																																			

ID	Task Name	Duration	Start	Finish	Estimated Hours	Responsible Party	Resource Initials	July				August				September				October				November				December				January					
								6/17	6/24	7/1	7/8	7/15	7/22	7/29	8/5	8/12	8/19	8/26	9/2	9/9	9/16	9/23	9/30	10/7	10/14	10/21	10/28	11/4	11/11	11/18	11/25	12/2	12/9	12/16	12/23	12/30	1/6
53		Complete and submit to DPW evidence of completed criminal background clearances for PPL Staff	16 days	Fri 8/10/12	Fri 8/31/12		PPL	PM																													
54		Obtain and submit to DPW a Federal Criminal History Record from the FBI for PPL staff who are not PA residents	16 days	Fri 8/10/12	Fri 8/31/12		PPL	PM																													
55		Copy of executed administrative Agreement with DPW	16 days	Fri 8/10/12	Fri 8/31/12		PPL	PM																													
56		Surety Bond	16 days	Fri 8/10/12	Fri 8/31/12		PPL	PM																													
57		Participate in the VF/EA FMA Organization Readiness Review	3 days	Wed 8/15/12	Fri 8/17/12																																
58		Timeframe for preparing enrollment and employment packets and distributing them to new and current individuals and representatives who will become common law employers	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM																													
59		Current database modification to meet all requirements of this RFA and the Agreement	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM																													
60		Staff recruitment and training process and timeline	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM																													
61		Modifications to a current call center	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM																													
62		Modification to a current website	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM																													
63		Recommended modifications to the current processes used by the Commonwealth for VF/EA FMS organizations	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM																													
64		Timeframe for computer networks to be installed and tested	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM																													
65		Timeframe for Medicaid billing systems to be implemented and tested	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM																													
66		Timeframe for Reporting system and reports to be tested and validated by VF/EA FMS organization and OLTL/PDA/ODP prior to implementation	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM																													
67		Timeframe for enrolling existing common law employers with the Selected Offeror(s)	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM																													
68		Develop a quality management system to monitor the requirements of this RFA and the Agreement	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM																													
69		Devote sufficient corporate staff to the Readiness Review process	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM																													
70		Play an active role in the Readiness Review process and demonstrate progress in an ongoing manner	22 days	Wed 8/15/12	Fri 9/14/12		PPL	PM																													
71		Host regular status meetings with the OLTL/PDA/ODP Readiness Review Team	22 days	Wed 8/15/12	Fri 9/14/12		PPL	PM																													
72		Prepare and submit a Corrective Action Plan (if applicable)	1 day	Mon 8/20/12	Mon 8/20/12		PPL	PM																													
73		Review Reporting Requirements and Specifications with the Commonwealth	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM,PPL ITS																													
74		Receive approval from the Commonwealth Grant Administrator on report formats	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM,PPL ITS																													
75		Provide an overview PCG Disaster Recovery Plan	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PPL ITS																													
76		Provide PCG Disaster Recovery Test Schedule and Resources	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PPL ITS																													
77		Review the PCG contingency plan for operations during an emergency situation	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PPL ITS																													
78		Review staff recruitment and training process timeline	3 days	Wed 8/15/12	Fri 8/17/12		PPL	PM,BCM																													
79		Draft Business Rules and Process Flow Document	13 days	Fri 8/3/12	Tue 8/21/12		PPL	PM																													
80		Revise and finalize PPL VF/EA FMS Organizational Policy and Procedures Manual for Pennsylvania	35 days	Fri 8/3/12	Fri 9/21/12		PPL	PM																													
81		Present approach PPL will take to establish, capture, document, evaluate and report on core performance metrics relative to the agreement	35 days	Fri 8/3/12	Fri 9/21/12		PPL	PM																													
82		Ensure capacity to provide materials in alternate print and languages	35 days	Fri 8/3/12	Fri 9/21/12		PPL	PM																													
83	📄	Supply a month one status report broken down by deliverable status	0 days	Fri 8/31/12	Fri 8/31/12		PPL	PM																													
84		PA DPW Approvals	33 days	Wed 8/8/12	Mon 9/24/12																																
85		DPW to sign off on PPL Welcome Letter copies to FEAs	3 days	Wed 8/8/12	Fri 8/10/12		DPW	ESM																													
86		DPW to sign off on Common Law Employer Enrollment Packets	3 days	Wed 8/8/12	Fri 8/10/12		DPW	ESM																													
87		DPW to sign off on DCW Enrollment Packet	3 days	Wed 8/8/12	Fri 8/10/12		DPW	ESM																													
88		DPW to sign off on Vendor Small Unlicensed Provider, and Independent Contractor Payment Packet	3 days	Wed 8/8/12	Fri 8/10/12		DPW	ESM																													
89		DPW to sign off on Communications Plan for F/EA Transition	1 day	Fri 8/10/12	Fri 8/10/12		DPW	PM																													
90		DPW to sign off on Business Rules and Process Flow	1 day	Wed 8/22/12	Wed 8/22/12		DPW	PM																													
91		DPW to sign off on the final Organizational Policy and Procedures Manual to the Commonwealth in electronic format	1 day	Mon 9/24/12	Mon 9/24/12		PPL	PM																													
92		Demonstrate all outstanding issues have been addressed	32 days	Wed 8/15/12	Fri 9/28/12		PPL	PM																													
93		Task I.1 - Project Kick-Off - Complete	0 days	Fri 9/28/12	Fri 9/28/12																																
94		Task I.2 - Operational Infrastructure Development	29 days	Wed 8/1/12	Tue 9/11/12	6,261								</																							

ID	Task Name	Duration	Start	Finish	Estimated Hours	Responsible Party	Resource Initials	July							August						September				October				November				December			January			
								6/17	6/24	7/1	7/8	7/15	7/22	7/29	8/5	8/12	8/19	8/26	9/2	9/9	9/16	9/23	9/30	10/7	10/14	10/21	10/28	11/4	11/11	11/18	11/25	12/2	12/9	12/16	12/23	12/30	1/6	1/13	
102	Establish a TTY TDD line	14 days	Tue 8/14/12	Fri 8/31/12		PPL	CS																																
103	Establish a DPW PDS program-specific email account	14 days	Tue 8/14/12	Fri 8/31/12		PPL	PPL ITS																																
104	Establish Teleforms fax number for paper based timesheet submittal	14 days	Tue 8/14/12	Fri 8/31/12		PPL	PPL ITS																																
105	Establish E-Timesheet fax number	14 days	Tue 8/14/12	Fri 8/31/12		PPL	PPL ITS																																
106	Create a UserID/Password and register PA Employer Withholding Account Identification Number on e-TIDES Internet Filing System to electronically file returns and payments	14 days	Tue 8/14/12	Fri 8/31/12		PPL	PIPM																																
107	File for and receive authorization from the PA Department of Labor and Industry to file state unemployment taxes electronically through the Pennsylvania Unemployment Compensation Management System (UCMS)	10 days	Tue 8/28/12	Tue 9/11/12		PPL	PIPM																																
108	Train PPL CS and Financial operations Specialists on program policies and procedures	10 days	Tue 8/28/12	Tue 9/11/12		PPL	PM																																
109	Launch a program-specific website for the DPW PDS Program on PPL Corporate Website	10 days	Tue 8/28/12	Tue 9/11/12		PPL	PPL ITS																																
110	Review written internal controls to monitor the accuracy of the website materials	10 days	Tue 8/28/12	Tue 9/11/12		PPL	PPL ITS																																
111	Task I.2 - Operational Infrastructure Development - Complete	0 days	Tue 9/11/12	Tue 9/11/12																																			
112	Task I.3 - Funds Management	62 days	Mon 8/6/12	Thu 11/1/12	2,111																																		
113	Establish access to the PROMISE claims processing and management information system	2 days	Mon 8/6/12	Tue 8/7/12		PPL	PPL ITS																																
114	Define service invoicing procedures, including schedule, format and file specifications with primary contacts for PROMISe	15 days	Mon 8/6/12	Fri 8/24/12		PPL	MBM																																
115	Initiate configuration of PPL Medicaid Billing System (MBS)	61 days	Mon 8/6/12	Wed 10/31/12		PPL	MBM																																
116	Bank Accounts	10 days	Mon 8/20/12	Fri 8/31/12																																			
117	Establish a project-specific segregated bank account for the DPW PDS program service funds	10 days	Mon 8/20/12	Fri 8/31/12		PPL	ACM																																
118	Establish a project-specific segregated bank account for the DPW PDS program administrative funds	10 days	Mon 8/20/12	Fri 8/31/12		PPL	ACM																																
119	Provide bank account and routing to DPW for electronic payment set up to PPL	10 days	Mon 8/20/12	Fri 8/31/12		PPL</																																	

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ID	Task Name	Duration	Start	Finish	Estimated Hours	Responsible Party	Resource Initials	July				August				September				October				November				December				January																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			
								6/17	6/24	7/1	7/8	7/15	7/22	7/29	8/5	8/12	8/19	8/26	9/2	9/9	9/16	9/23	9/30	10/7	10/14	10/21	10/28	11/4	11/11	11/18	11/25	12/2	12/9	12/16	12/23	12/30	1/6	1/13																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
251	Task III.2 - Enrollment Processing of Transitioning Common Law Employers - Complete	0 days	Mon 12/31/12	Mon 12/31/12																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															

ID	Task Name		Duration	Start	Finish	Estimated Hours	Responsible Party	Resource Initials	ter Jun	3rd Quarter Jul Aug Sep	4th Quarter Oct Nov Dec	1st Quarter Jan Feb Mar	2nd Quarter Apr May Jun	3rd Quarter Jul Aug Sep	4th Quarter Oct Nov Dec	1st Quarter Jan Feb Mar	2nd Quarter Apr May Jun	3rd Quarter Jul Aug Sep	4th Quarter Oct Nov Dec	1st Quarter Jan Feb Mar
278	Phase IV - Ongoing Operations		602 days	Fri 8/31/12	Wed 12/31/14															
279	Task IV.1 - Program Management		602 days	Fri 8/31/12	Wed 12/31/14	21,762														
280	Commence ongoing F/EA FMS services effective 10/1/2012 for new enrollees		582 days	Mon 10/1/12	Wed 12/31/14		PPL	PM												PM
281	Operate in accordance with §3504 of the Internal Revenue Service (IRS) Code, Revenue Procedure 70-6, 1970-1 C.B. 420, and IRS REG- 137036-08 and any other future revenue procedures, notices or publication promulgated by the IRS		582 days	Mon 10/1/12	Wed 12/31/14		PPL	PM												PM
282	Ensure comprehensive provision and quality assurance of VF/EA FMS to eligible individuals (and representative when applicable) enrolled in the waivers or state-funded programs opting to use PDS		582 days	Mon 10/1/12	Wed 12/31/14		PPL	PM												PM
283	Ensure program participants and representatives are served by engaged\qualified staff that are knowledgeable of PDS and the provision of VF/EA FMS		582 days	Mon 10/1/12	Wed 12/31/14		PPL	PM												PM
284	Ensure all PPL project staff work cooperatively with DPW, PDA and OLTL/ODP staff and their designees and coordinate on execution of project objectives		582 days	Mon 10/1/12	Wed 12/31/14		PPL	PM												PM
285	Ensure all personnel working on the project are receiving appropriate training		582 days	Mon 10/1/12	Wed 12/31/14		DPW	PM												PM
286	Ensure all PPL project employees have an executed confidentiality agreement on file prior to assuming project responsibilities		582 days	Mon 10/1/12	Wed 12/31/14		PPL	PM												PM
287	Ensure designated program staff coordinate and effectively communicate with CM/SC Organizations, AEs, and Commonwealth as necessary		582 days	Mon 10/1/12	Wed 12/31/14		PPL	PM												PM
288	Abide by the Commonwealth's specific regulations and requirements concerning confidentiality of information and HIPAA Business Associate Language provided by		582 days	Mon 10/1/12	Wed 12/31/14		PPL	PM												PM
289	Comply with applicable federal and state laws, regulations, and rules regarding the security and confidentiality of information individuals receiving Medicaid waiver		582 days	Mon 10/1/12	Wed 12/31/14		PPL	PM												PM
290	Abide by record retention procedures for all applicable federal, state and local government agencies		582 days	Mon 10/1/12	Wed 12/31/14		PPL	PM												PM
291	Follow Commonwealth procedures for information handling and sharing		582 days	Mon 10/1/12	Wed 12/31/14		PPL	PM												PM
292	Ensure ongoing compliance with HIPAA standards and guidelines in all business operations		582 days	Mon 10/1/12	Wed 12/31/14		PPL	PM												PM
293	Prepare and distribute Monthly financial reports to common law employers; Administrative Entity; Care Managers/Service Coordinators; OLTL;ODP; and PDA as required		582 days	Mon 10/1/12	Wed 12/31/14		PPL	PIPM												PIPM
294	Conduct regular Steering Committee Meetings and manage the execution of all resulting action items and deliverables		602 days	Fri 8/31/12	Wed 12/31/14		PPL	PM												PM
295	Supply a monthly status report broken down by deliverable status		602 days	Fri 8/31/12	Wed 12/31/14		PPL	PM												PM
296	Prepare and submit a written progress report by the tenth of the month or more frequently, as requested		602 days	Fri 8/31/12	Wed 12/31/14		PPL	PM												PM
297	Ensure standard reports and deliverables are made on the agreed upon schedule		602 days	Fri 8/31/12	Wed 12/31/14		PPL	PIPM												PIPM
298	Meet all reporting requirements to assure the Commonwealth that VF/EA FMS are being provided in compliance with federal, state and local taxes and labor laws		560 days	Thu 11/1/12	Wed 12/31/14		PPL	PIPM												PIPM
299	Deliver OLTL/PDA/ODP reports via FTP using DPW's e-gov application (or other secure ftp)		560 days	Thu 11/1/12	Wed 12/31/14		PPL	PM												PM
300	Ensure Monthly Utilization Reports are supplied to program participants		546 days	Mon 11/26/12	Wed 12/31/14		PPL	PIPM												PIPM
301	Monitor the accuracy of the materials on the DPW PDS specific website		521 days	Wed 1/2/13	Wed 12/31/14		PPL	PM												PM
302	Ensure proper disposal of both hard and electronic working copies of information during work on this project as well as upon project completion		521 days	Wed 1/2/13	Wed 12/31/14		PPL	PM												PM
303	Ensure adequate measures are in place to prohibit unauthorized access, copying and/or distribution of information during work on the project		521 days	Wed 1/2/13	Wed 12/31/14		PPL	PM												PM
304	Maintain the Organization Procedures Manual to ensure compliance with current policies and procedures on all FMS responsibilities (update annually or as applicable and obtain DPW sign off on changes)		521 days	Wed 1/2/13	Wed 12/31/14		PPL													

ID	Task Name	Duration	Start	Finish	Estimated Hours	Responsible Party	Resource Initials	1st Quarter			2nd Quarter			3rd Quarter			4th Quarter			1st Quarter			2nd Quarter			3rd Quarter			4th Quarter			1st Quarter		
								Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
311	Maintain records of all communications with federal, state and local tax, labor and workers' compensation coverage and with DPW, OLTL/PDA/ODP, CM/SCs and AE as applicable	521 days	Wed 1/2/13	Wed 12/31/14		PPL	PM																											
312	Establish and review internal performance standards to evaluate effectiveness & efficiency of operations (timeliness and accuracy of payment, customer service, complaints, satisfaction, non-provision of services)	479 days	Fri 3/1/13	Wed 12/31/14		PPL	PM																											
313	Prepare and submit all Quarterly and Annual Status Reports	458 days	Mon 4/1/13	Wed 12/31/14		PPL	PIPM																											
314	Organize and host a quarterly Advisory/Grievance Committee meeting	458 days	Mon 4/1/13	Wed 12/31/14		PPL	PM																											
315	Participate VF/EA FMS Organization Performance Review with sufficient staff to facilitate the process	458 days	Mon 4/1/13	Wed 12/31/14		PPL	PM																											
316	Play an active role in the Performance Review process and demonstrate progress in an ongoing manner	458 days	Mon 4/1/13	Wed 12/31/14		PPL	PM																											
317	Prepare a corrective action plan and address all outstanding issues identified during the Performance Review	458 days	Mon 4/1/13	Wed 12/31/14		PPL	PM																											
318	Host regular status meetings with the OLTL/PDA/ODP Performance Review Team	458 days	Mon 4/1/13	Wed 12/31/14		PPL	PM																											
319	Ensure semi-annual orientation and training to CM/SC and Administrative entities on the role and responsibilities of the VF/EA FMS	393 days	Mon 7/1/13	Wed 12/31/14		PPL	PIPM																											
320	Ensure criminal background checks are completed on an annual basis for any PPL employee or sub-contractor performing work on the project	393 days	Mon 7/1/13	Wed 12/31/14		PPL	PM																											
321	Maintain business licensure in the state of PA; surety bond; registration as a Medicaid Provider and OLTL VF/EA FMS Special Provider Agreement	393 days	Mon 7/1/13	Wed 12/31/14		PPL	DFP																											
322	Administer annual common law employer satisfaction survey	393 days	Mon 7/1/13	Wed 12/31/14		PPL	PM																											
323	Develop and implement a corrective action plan based on the results of the annual common law employer satisfaction survey	304 days	Fri 11/1/13	Wed 12/31/14		PPL	PM																											
324	Task IV.1 - Program Management - Complete	0 days	Wed 12/31/14	Wed 12/31/14																														
325	Task IV.2 F/EA FMS Customer Service	582 days	Mon 10/1/12	Wed 12/31/14	33,907																													
326	Provide Customer Service that is accurate, timely, family friendly and reflect the principles of self determination	582 days	Mon 10/1/12	Wed 12/31/14		PPL	CS																											
327	Provide Customer Service during the business hours of 8:30 am to 5:00 pm EST/EDT (and in accordance with the DPW 37.5 hr work week) with a VM box for after hours	582 days	Mon 10/1/12	Wed 12/31/14		PPL	CS																											
328	Respond to all participant calls within one business day of receipt of call	582 days	Mon 10/1/12	Wed 12/31/14		PPL	CS																											
329	Follow up on missing paperwork within 24 hours of receipt	582 days	Mon 10/1/12	Wed 12/31/14		PPL	PIPM																											
330	Provide translation services (e.g. American Sign language) and services for persons with limited English proficiency	582 days																																





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ID		Task Name	Duration	Start	Finish	Estimated Hours	Responsible Party	Resource Initials	ter	3rd Quarter				4th Quarter				1st Quarter				2nd Quarter				3rd Quarter				4th Quarter				1st Quarter				2nd Quarter				3rd Quarter				4th Quarter				1st Quarter			
									Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar											
511		Submit Draft Final Report to the Commonwealth prior to the submission of the actual report (at the end of the three year agreement)	109 days	Fri 8/1/14	Wed 12/31/14		PPL	PIPM																																													
512		Continue to provide F/EA FMA on a month to month basis for up to 6 months if the subsequent F/EA FMS organization is unable to assume operations	109 days	Fri 8/1/14	Wed 12/31/14		PPL	PM																																													
513		Ensure all records are properly retained for 6 years after completion of the project	0 days	Wed 12/31/14	Wed 12/31/14		PPL	PIPM																																													