

NCHSD's Guide to the 2011 Medicaid Infrastructure Grant Solicitation

The Centers for Medicare and Medicaid Services (CMS) released the annual announcement for new (competitive) Medicaid Infrastructure Grants (MIGs) on May 27, 2010. The [2011 MIG Solicitation](#) brings a new focus to state efforts to build *sustainable* infrastructure that improves employment outcomes for people with disabilities.

This guide describes general grant requirements and explains issues for states to consider in going forward with a MIG application. The guide highlights review criteria in the 2011 Solicitation that are substantially different from those from last year's solicitation. We give particular attention to the Sustainability Workplan now required of all grantees.

For more information, please visit NCHSD's [online library](#) at www.nchsd.org, where you'll find many states' MIG applications from previous years, among other useful resources.

Important: Applications are due July 16. This year, applicants must apply online at www.grants.gov ONLY; no mailed applications will be accepted.

WHAT'S NEW FOR 2011

The 2011 Solicitation brings a strong forward-looking approach to state infrastructure development. States must focus on ensuring that the MIG has a long-term, enduring impact on disability employment infrastructure. The Review Criteria for applicants are quite different than in previous years; be sure to read this new section carefully—it begins on page 22 of the Solicitation.

Among other new features, applicants are required to complete a Sustainability Workplan using a template provided in the Solicitation. We discuss the Review Criteria in more detail on page 5 of this Guide.

The 2011 Solicitation, also for the first time, mentions two new areas of Medicaid infrastructure development that states can address with grant funds. In addition to PAS, supported employment and Medicaid Buy-In, states may “address improving existing employment policies for workers with disabilities upon retirement, or, developing effective coordination with systems changes underway due to national Health Care Reform legislation” (Solicitation, page 4).

The 2011 grant cycle will be the last year of funding under the MIG's current authorization, so all MIG awards will be for one year, with the possibility of one 12-month no-cost extension.

New Comprehensive Employment Systems grantees will no longer be required to carry out a statewide strategic planning process.

GENERAL GRANT REQUIREMENTS

Either of the following entities may apply: (a) the single State Medicaid agency; or (b) any other agency or instrumentality of a State in partnership, agreement and active participation with the single State Medicaid agency, the State Legislature, or the Office of the Governor.

Under the MIG program, funding is available to develop either *basic* Medicaid infrastructure or *comprehensive* employment infrastructure to support people with disabilities in competitive employment.

The Basic MIG is the original grant program designed to support states in developing Medicaid infrastructure such as Medicaid Buy-In programs, personal assistance services, supported employment for people with mental health disabilities, and peer supports to gain and maintain employment. Basic MIG grant awards are from a minimum of \$500,000 per year to a maximum of \$750,000.

States that do not have a Medicaid Buy-In program are limited to applying for the Basic MIG, which can provide valuable resources to develop, implement and promote that vital Medicaid work incentive program. But states with a Basic MIG can also engage in a wide variety of activities to identify other needed work incentives and employment support services. In many states, a MIG is "Basic" in name only.

A Comprehensive MIG is designed for states that have basic Medicaid infrastructure in place, but want to continue developing their overall employment system for people with disabilities. Applicants for the Comprehensive Employment Systems MIG (or "CES") grant must already have a Medicaid Buy-In program with an income limit no lower than 200% of the federal poverty level. The CES grant focuses on 3 major goals:

- Maximizing employment for people with disabilities.
- Increasing the state's labor force through the inclusion of people with disabilities.
- Protecting and enhancing workers' healthcare, other benefits and needed supports.

Comprehensive MIG awards are from a minimum of \$500,000 to a maximum of 10 percent of the state's Medicaid Buy-In service cost expenditures.

States that have a Medicaid Buy-In in place (with an income limit at least 200 percent of FPL) have the choice of pursuing either a Basic or a Comprehensive MIG. In previous years,

Comprehensive grants provided the opportunity to complete a statewide, comprehensive strategic planning process—this is not offered under the 2011 Solicitation.

TA TIP: *All MIG applicants can request an award up to \$750,000 regardless of Medicaid Buy-In expenditures, although requests greater than \$500,000 are subject to a higher evaluative standard, including an assessment of the merits of your sustainability plans.*

TA TIP: *CMS expects MIG project budget requests to reflect activities and expenses to be undertaken in 2011, since it is the last year of funding under the current program authorization. Awards above \$750,000 for Comprehensive Employment Systems grantees will be considered based on the overall amount of funding available in the grant program, the merit of the applicant's sustainability plan and project budgets, and the applicant's past spending performance under previous MIGs.*

Requirements that apply to both Basic and Comprehensive grants:

PAS: Your state must meet the PAS eligibility requirements for statewide, comprehensive personal assistance services for people with disabilities in full-time, competitive employment. PAS requirements are detailed in Appendix One of the Solicitation.¹

Expending Funds: If you have a current MIG grant, you must expend a majority of the existing funds in order to receive new, additional MIG funds. States with a no-cost extension under a previous MIG cannot receive a new MIG award.

Additional requirement for a Comprehensive grant:

MBI Status: To apply for a comprehensive grant, states must have a Medicaid Buy-In program in place that has a minimum income eligibility of 200% FPL.

TA TIP: *This year's Solicitation also adds two additional Medicaid infrastructure issues for MIGs to consider addressing with grant funding: Policies to meet the needs of retiring Medicaid Buy-In enrollees (who might lose Medicaid when they stop working due to retirement savings accrued while they were on the Buy-In) and efforts to coordinate health care reform implementation as it affects Medicaid Buy-In enrollees. These are areas that both Basic and Comprehensive MIGs should consider tackling in 2011.*

¹ MIG applicants must also submit a letter from the State Medicaid Director attesting that the state's PAS programs have 1) a review process for individuals to request more services or a different type of service than was made available to them; 2) services that are available both day and night on any day of the week they are needed; and 3) medical necessity definitions that do not preclude the availability of assistance with instrumental activities of daily living to support competitive employment. For more information about PAS eligibility, contact Sara Salley at NCHSD (ssalley@hdadvocates.org).

So...Which Way to Go?

CMS has supported state efforts under both approaches equally, so your application should center on the unique situation and factors present in your state. Ask yourself these questions:

- ? What are the issues your stakeholders—including people with disabilities—identify as key priorities for reducing gaps in employment systems infrastructure?
- ? In what areas could the MIG resources have the greatest short- and long-term impact on increased employment, service capacity, or sustainable infrastructure development?

If a focus on the Medicaid program addresses these questions—including implementing a Medicaid Buy-in program, improving personal assistance services, ensuring access to healthcare, or developing supported employment and peer supports—the Basic MIG may be a good approach for you.

- ? Is your state ready for a more comprehensive, cross-agency, public-private approach to disability employment systems development?
- ? Is coordination across service systems that support employment—such as workforce development, vocational rehabilitation, and education, in addition to Medicaid—a high priority for people with disabilities in your state?
- ? Does your state have Medicaid Buy-In expenditures that make it eligible for an award above \$750,000 per year?

If Buy-In expenditures in your state total more than \$7.5 million (including state and federal share, but not including administrative expenses), the CES grant offers the opportunity for an award equal to 10 percent of those expenditures.

THE HEART OF THE APPLICATION: THE PROJECT NARRATIVE

This year, all MIG applicants—Basic and CES—have the same review criteria for the project narrative, and the criteria differ substantially from previous years. However, the page limit for the narrative is the same—it cannot be longer than 40 pages double-spaced, including a Sustainability Workplan but not including budget information or other required appendices.

1. Vision for Systems Change (10 points)

Applicants must “present a clear, succinct and compelling vision for an integrated, competitive employment infrastructure in 2011 and beyond” (Solicitation, page 22). This discussion should

include a brief description of relevant employment barriers and stakeholder involvement in the grant.

TA TIP: *In determining the amount of information to include in each section of the narrative, take guidance from the number of points awarded for the section. Where previous solicitations required a thorough “environmental scan” and description of the applicant state’s existing programs and activities, the new Solicitation awards only ten out of a total of 100 points for this part of the application, indicating that an in-depth analysis of barriers is not needed.*

2. Goal and Objectives (30 points)

Applicants must undertake specific goals and objectives to “offer enduring and significant improvement in the ability of the system to provide adequate health coverage for people with disabilities, who are competitively employed, provide needed personal assistance and other supports, and/or remove other significant employment barriers” (Solicitation, page. 23).

Goals and objectives must be clearly stated, outcome-oriented, and targeted towards removing the major barriers identified by grant stakeholders as described in the Vision section. Together, the goals and objectives will describe the results the grant is seeking to achieve, and the strategies that will lead to those results. There should be a logical connection between the chosen strategies and the goals—in other words, implementing the strategies should logically and necessarily lead to achieving the goal.

*A Goal is the measureable outcome the grant is seeking to achieve.
Objectives are the strategies the grant will use to achieve the Goal.*

3. Outreach and Partnerships (30 points)

Working collaboratively with stakeholders has always been a hallmark of MIG projects, and will continue to be under the 2011 grants. Applicants must describe how they will bring together key stakeholders and partners to implement grant goals and sustain the grant’s achievements in the long term. Each stakeholder’s level of commitment to the project’s disability employment vision must be addressed.

Applicants must also identify any management information tools that will track and support the grant’s progress in achieving its goals.

TA TIP: *Building partnerships through the MIG is more important now than ever. Support for the MIG’s goals both inside and outside state agencies is critical to ensuring that infrastructure change will be meaningful and lasting. NCHSD can help you strategize ways to overcome obstacles and gain the full support of internal stakeholders such as the leadership of diverse state agencies, and external stakeholders such as advocates, legislators and businesses.*

4. Sustainability Workplan and Self-Assessment (30 points)

A unique feature of this year's Solicitation is the requirement that states complete a detailed Sustainability Workplan using a template developed specifically for the Solicitation. The workplan calls upon applicants to address key indicators that will help ensure the sustainability of grant initiatives.

The workplan template (Solicitation, page 27) calls upon applicants to address three "sustainability measures" for each of their grant goals: 1) Internal and external leadership, 2) performance measures and 3) sustainability strategies. Together, these components are designed to focus grant resources on activities that will lead to long-term systems change with an impact far beyond the grant period.

A critical part of the template is the applicant's own assessment of its current or anticipated ability (or its partners' ability) to carry forward grant goals after MIG funding ends.

***TA TIP:** Don't be afraid to acknowledge weaknesses in your state—CMS expects applicants to provide an "honest assessment" of their capacity. Just be sure to identify in the workplan how you will use 2011 MIG funding to address the shortcomings, such as by identifying partners and resources during the upcoming year.*

***TA TIP:** Don't forget—the completed Sustainability Workplan counts towards the 40-page limit that applies to the project narrative.*

ADDITIONAL REQUIRED ELEMENTS

Technical Assistance

The Solicitation requires a technical assistance (TA) plan to reflect the types of needs you expect to experience while implementing your MIG project, as well as a corresponding budget. CMS encourages MIGs to participate in TA partnerships and activities that bring together other states with similar topical interests and needs. CMS suggests not to budget more than \$50,000 or 8 percent of grant funds, whichever is less, towards technical assistance. Larger amounts can be justified, provided there is no duplication of services.

***TA TIP:** View the [2010 NCHSD Technical Assistance Menu](#) for more ideas on information sharing and technical assistance...and take some time to consider the expertise you have to share with states across the country.*

Meaningful Involvement of People with Disabilities

States should ensure people with disabilities have effective and meaningful involvement throughout project design, implementation and evaluation. "Meaningful" involvement is more

than rhetoric—it requires people with disabilities to have real decision-making power in policy processes.

TA TIP: *Soliciting and sharing information, supporting forums for discussion and providing adequate staff and resources for stakeholder groups are all critical investments toward developing stakeholder leadership. Consider compensating people with disabilities for their time, travel and meal expenses as a way to demonstrate the value of their participation.*

Grant Period and No-Cost Extensions

Under the 2011 Solicitation, CMS will make one-year awards for the period January 1, 2011, through December 31, 2011, with the possibility of one 12-month no-cost extension at the end of the grant period. When determining how much a state's 2011 will be, CMS will consider how well the state has expended or obligated funds under their current grant. Because applications are required so early in the current grant period (July 16), CMS will look at 2010 MIG expenditures as of early September before making awards in November.

CMS will not make a new competitive grant award to a state that has a no-cost extension under a previous grant for the same period.

TA TIP: *It's more important than ever to make sure grant funds are expended in a timely way this year. Take action now to get grant monies out the door, so you can provide CMS the assurance it needs that your state should receive a full award for 2011.*

KEY CONSIDERATIONS

The following checklist and deadlines are provided to help you start putting together a winning MIG application. These lists aren't exhaustive—be sure to review the list of required contents that begins on page 16 of the Solicitation and contact NCHSD if you need technical assistance. We're here to help!

- Does your state offer personal assistance services (PAS) to support full-time competitive employment for people, either through the state Medicaid plan, or a combination of the state Medicaid plan and home- and community-based waiver programs?
- Has your state Medicaid director completed an attestation letter for PAS to include in the application?
- Have you allowed sufficient time to meet the Central Contractor Registry requirements (page 21 of the Solicitation)?
- Are the grant goals and activities consistent with the MIG goals stated in the Solicitation?

- Do you have the information you need to complete the Sustainability Workplan Template for each of your proposed goals?
- How will you provide meaningful opportunities to involve people with disabilities throughout the design, implementation and evaluation of the grant?
- Have you considered the relative weight of the Review Criteria (starting on page 22) in your application?
- Do you have a plan for sustainability or process for developing sustainability options for your grant initiatives?
- Are you familiar with Grants.gov with the electronic submission process and all of the technical requirements?
- Do you need to reach out to key stakeholders and secure their active partnership in the grant?
- Have you secured letters of support from important advocacy groups, partnering agencies, the university, the Governor's office and others?
- Have you allowed enough time for your state's internal review and signoff?
- Have you called NCHSD to help customize a technical assistance plan to meet your needs in 2011?

DEADLINES

May 27: 2011 MIG Solicitation released ([available online](#)).

June 8, COB: Submit questions to CMS (email TheMIGTeam@ascellon.com).

June 11, 2pm ET: Solicitation Q & A call with CMS (call notes [posted online](#) week of June 14).

June 14: Optional, non-binding Letter of Intent due (by email to Effie.George@cms.hhs.gov).

July 16: Grant Deadline—submit application online at grants.gov.

November 30: Grant awards announced by this date.