

## Fiscal Year (FY) 2021-2022 Individual Support Plan (ISP) Renewal Guidance

### ODP Announcement 21-032

#### **AUDIENCE:**

Administrative Entities (AEs)

Supports Coordination Organizations (SCOs)

Supports Coordinators (SCs)

All Providers of Consolidated, Community Living or Person/Family Directed Support Waivers  
or Base-Funded Services

Other Interested Parties

*This Communication does not apply to Adult Autism Waiver (AAW) Providers*

#### **PURPOSE:**

This Office of Developmental Program (ODP) communication will provide guidance for the FY 2021-2022 renewal period. The following topical areas will be addressed in this communication:

1. General Guidance – Consideration for COVID-19 Pandemic
2. Person/Family Directed Support (P/FDS) and Community Living Waiver (CLW) Cap Exceptions
3. Variance Process for Established Service Requirements
4. Creating FY 2021-2022 Renewals
5. Consolidated Waiver Fee Schedule Residential Rate Exceptions
6. FY 2021-2022 Waiver Rate Load in HCSIS
7. Resources

#### **DISCUSSION**

This communication is intended to provide guidance to all stakeholders who participate in the FY 2021-2022 renewal ISP process. While ODP has not added any new services that will impact the FY 2021-2022 renewal ISPs, it is anticipated that the COVID-19 pandemic will continue to influence FY 2021-2022 service needs.

## 1. **GENERAL GUIDANCE**

The duration of COVID-19 and efforts to resume services as approved in the current waivers is unknown at this time. To ensure adequate planning to meet the anticipated needs of individuals during FY 2021-2022, all stakeholders involved in the planning process should assume, at a minimum, that an individual's current level of service and support needs are reflected in their FY 2021-2022 renewal ISP until ODP issues subsequent guidance. If service units were reduced in FY2020-2021 due to underutilization, ISP Teams should determine whether those units should be restored in FY2021-2022 due to:

- A change in conditions (the individual's preferred CPS service location has reopened, it is anticipated that CPS closures will be less frequent due to COVID-19 vaccinations, the service provider is resuming the option for face-to-face service delivery, etc.); and/or
- The individual's needs have changed (the individual would like to resume face-to-face services or would like to reengage in community activities, etc.)

As conditions and needs change during FY 2021-2022, the individual's needs should be discussed and evaluated by the ISP Team and the individual's ISP should be revised to accurately reflect the individual's needs. Team meetings should occur as needed, to address the impact of removal of restrictions, when applicable, that were imposed as a result of the COVID-19 pandemic. Meetings may need to occur that are outside the normal annual meeting.

### **Guidance to Address Shifts in Services Due to COVID-19 Pandemic**

ODP recognizes that the COVID-19 pandemic has caused community-based service delivery to shift to alternative approaches and supports, such as using a remote option for the provision of services. Fiscal year 2021-2022 ISPs should reflect service type, duration, frequency and amount that most accurately reflect and will meet the individual's anticipated needs.

ISP Teams should reference ODP's Individual Transition Guide and probe guidance in the annotated ISP to assess risk related to the COVID-19 pandemic. These discussions will determine for each individual what services and supports are needed for the individual to be able to safely resume activities or engage in new activities. All conditions outlined in [Appendix K of the Intellectual Disabilities/Autism Waivers Operational Guidance \(Version 2.0\)](#) continue to apply.

### **Community Participation Supports (CPS), Transportation and Residential Habilitation Services**

CPS, Transportation and Residential Habilitation providers are encouraged to collaborate with and respond to feedback requests made by SCOs and AEs related to individual attendance, expectations for transportation services and Residential Habilitation with and without day services.

## **2. PERSON/FAMILY DIRECTED SUPPORT (P/FDS) WAIVER AND COMMUNITY LIVING WAIVER CAP EXCEPTIONS**

Individuals who have an approved P/FDS or CLW cap exception in FY 2020-2021 due to the COVID-19 pandemic will continue to have a cap exception in FY 2021-2022.

Due to the auto authorization functionality within HCSIS, SCs should mark ISPs for *manual review* for FY 2021-2022 ISPs approved for an individual cap exception. AEs will conduct manual reviews of ISPs to ensure that the approved cap is not exceeded. AEs will need to manually approve and authorize ISPs with approved cap exceptions to ensure the content and services align with [Appendix K of the Intellectual Disabilities/Autism Waivers Operational Guidance \(Version 2.0\)](#). AEs should identify and report to their designated ODP Regional Waiver Capacity Managers any individual for whom an individual cap exception is no longer needed.

It is ODP's expectation that ongoing planning efforts to transition individuals to the CLW continue for individuals who are approved for a P/FDS cap exception prior to the COVID-19 pandemic. After the FY 2021-2022 renewal period, ODP intends to request updates from applicable parties on transition efforts. A future ODP communication will outline AE reporting requirements to support ODP assessment of transition efforts.

Cap exception questions should be directed to the ODP Regional Program Office.

## **3. VARIANCE PROCESS FOR ESTABLISHED SERVICE REQUIREMENTS**

Service, service units and service date segments on the FY 2021-2022 renewal ISPs should accurately reflect approved units and approved variance timeframes based on the annual date.

## **4. CREATING FY 2021-2022 RENEWALS**

When a FY Renewal is created in HCSIS, all current services for the 2020-2021 fiscal year are copied over to the 2021-2022 FY Renewal plan.

- **SCO Action:** As a result of the Department of Human Services (Department) implementing temporary increased fee schedule rates for CPS and Transportation Trip services, two service segments are likely present on some FY 2020-2021 plans and got copied over to the FY 2021-2022 Renewal plan. SCs should ensure the individual's FY 2021-2022 Renewal plan is adjusted to reflect only one service segment for CPS and Transportation Trip service and contains the appropriate unit amount before submitting for approval.
  - See the resource ODP-ID/A: SC100I Supports Coordination > Chapter 17: Fiscal Year Renewal: ISP - v8.0 9/21/13 in the LMS for information on how to perform a FY Renewal and directions on how to remove services (page 10) from a fiscal year renewal ISP.
- **AE Action:** Some fee schedule rates were increased during FY 2020-2021, when the FY 2021-2022 Renewal is adjusted to be annualized, it is possible that either the P/FDS or CLW cap could be exceeded. AEs who have access to the Enterprise Data Warehouse (EDW) should review the ODP AE Performance Dashboard for a list of waiver participants with current FY 2020-2021 authorizations near the waiver cap.
  - To access the AE Performance Dashboard, click on the following link: <https://www.dpwrpt.state.pa.us> > enter your username and password > click the HCSIS link > click *Near Real Time Reports* > click *ODP AE Reports*

## **5. CONSOLIDATED WAIVER FEE SCHEDULE RESIDENTIAL RATE EXCEPTION**

ODP will carry forward all approved Needs Exception Allowances from FY 2020-2021 to FY 2021-2022.

**6. FY 2021-2022 WAIVER RATE LOAD IN HCSIS**

When the FY Renewal plan is created, the rates will load automatically and will be placed in provisional status until the Reserve to Encumbrance (R2E) is run. If a rate fails to load into the FY 2021-2022 Renewal plan, please contact [ra-ratesetting@pa.gov](mailto:ra-ratesetting@pa.gov) mailbox.

**7. RESOURCES**

For information related to special considerations, please contact the ODP Regional Program Office assigned to your region.

For questions related to the participant-directed services (PDS rate table or calculator), please contact your ODP Regional Financial Management Services (FMS)/PDS Lead.

See the resource *ODP-ID/A: SC100I Supports Coordination > Chapter 17: Fiscal Year Renewal: ISP - v8.0 9/21/13* in the LMS for information on how to perform a FY Renewal and directions on how to remove services (page 10) from a fiscal year renewal ISP.

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<sup>i</sup> See [ODP ANNOUNCEMENT 021-17](#) and [ODP ANNOUNCEMENT 021-21](#)