

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

ODP Announcement 21-032 Update

AUDIENCE:

Administrative Entities (AEs), Supports Coordination Organizations (SCOs), Supports Coordinators (SCs), All Providers of Consolidated, Community Living or Person/Family Directed Support (P/FDS) Waivers or Base-Funded Services, Other Interested Parties

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

Updates appear in red

PURPOSE:

This Office of Developmental Programs' (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. **(Updated)** Person/Family Directed Support (P/FDS) and Community Living Waiver (CLW) Cap Exceptions
3. Variance Process for Established Service Requirements
4. **(Updated)** Creating FY 2021-2022 Renewals (Addressing Partial Year Service Segments)
5. Consolidated Waiver Fee Schedule Residential Rate Exceptions

6. (Updated) 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.

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 restriction removals, 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 what services and supports are needed for each 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.

Person/Family Directed Support Waiver (P/FDS) and Community Living Waiver (CLW) 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 the same cap exception in FY 2021-2022.

The FY 2021-2022 P/FDS and CLW cap and all FY 2021-2022 cap exceptions became active on April 20, 2021. For new cap exception requests, please follow the guidance posted on the Pennsylvania Department of Human Service (DHS) webpage. This guidance can be found by using the following hyperlink: [ODP-Waiver Cap Exceptions \(pa.gov\)](#). The existing template should be used for any new cap exceptions requests.

Due to the auto authorization functionality within HCSIS, SCs should mark ISPs for *manual review* for FY 2021-2022. For ISPs approved for an individual cap exception, AEs will conduct manual reviews to ensure that the approved cap is not exceeded. AEs will need to manually approve and authorize the ISPs with approved cap exceptions to ensure the content and services are aligned with the COVID-19 [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 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 your ODP Regional Waiver Capacity Manager.

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.

CREATING FY 2021-2022 RENEWALS

Guidance for Updating FY 2021-2022 Renewal Plans with a Partial Year Service Segment for Community Participation Supports (CPS) and Transportation Trip

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. **However, if there were multiple service segments for the same service in the FY 2020-2021 plan and one of the segments had an end-date before the end of that fiscal year, that service segment will not be copied over into the FY Renewal plan. As a result, the begin date, end date and units for the partial service segment on the FY Renewal plan will need to be adjusted by the SCO before submitting for approval.**

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

Because 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 Community Living Waiver 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, follow these instructions: Go to

<https://www.dpwrpt.state.pa.us>> enter your username and password > click the HCSIS link > click *Near Real Time Reports* > click *ODP AE Reports*

CONSOLIDATED WAIVER FEE SCHEDULE RESIDENTIAL RATE EXCEPTION

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

FY 2021-2022 WAIVER RATE LOAD IN HCSIS, SERVICE AND SUPPORTS DIRECTORY (SSD) AND CONTRACTS

If a FY 2021-2022 service is missing in the SSD but existed in the SSD for FY 2020-2021, then a contract was not created. This could happen for the following reasons:

1. Mass rate change corrections could be pending because the P/FDS cap was exceeded and the plan needs to be adjusted and has not been completed yet by the AE or,
2. If the FY 2021-2022 renewal is created while a FY 2020-2021 plan is in draft status (contact AE) or,
3. The qualified provider chose not to offer the service in FY 2021-2022 for a particular county or the provider is not qualified to render the service in the upcoming fiscal year or,
4. If the FY 2021-2022 rate does not exist in PROMISe™ or a contract needs to be manually created. (For this specific scenario, e-mail the rate setting mailbox: ra-ratesetting@pa.gov).

If none of the scenarios above are true for your situation, contact the HCSIS helpdesk (1-866-444-1264, c-hhcsishd@pa.gov) request a TFS ticket is opened, explain your issue, provide them with a Master Client Identifier (MCI) number, provider Master Provider

Identifier (MPI) number, service location code and procedure code to enable them to perform a root cause analysis.

General information about contract creation and rates in HCSIS:

When a contract is created for FY 2021-2022, it will contain the FY 2020-2021 rate if the contract is in provisional status or will contain the FY 2021-2022 rate once the overnight *provisional to real* job is run automatically. The “Provisional on Hold” batch job began running overnight on April 22, 2021 and will continue running until ODP requests otherwise. This batch job runs daily overnight and converts provisional contracts to real contracts if a FY 2021-2022 rate exists in PROMISe™. If the provisional contracts were converted to real, then users will see the FY 2021-2022 rate reflected in the SSD and the Fiscal Year Renewal plan will reflect the FY 2021-2022 rate for services pre-authorized on the plan.

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