

Updated Guidance for the Community Participation Support (CPS) Service in the Intellectual Disability/Autism (ID/A) Waivers and Day Habilitation in the Adult Autism Waiver (AAW)

ODP Announcement 24-067

AUDIENCE:

Administrative Entities (AEs)
Supports Coordination Organizations (SCOs)
Providers of Community Participation Support (CPS)
Providers of Day Habilitation
Any Interested Stakeholder

PURPOSE:

To announce updated guidance for the CPS and Day Habilitation services and requirements related to Quality Management (QM) Plans.

DISCUSSION:

On November 1, 2023, amendments to the Office of Developmental Programs' (ODP) ID/A waivers and AAW became effective, which included significant changes to the CPS and Day Habilitation services. One of these changes was about new criteria for

community inclusion for each service location as a whole. The following guidance was provided during a December 2023 webinar and is available in the approved waivers:

“Providers with service locations where more than 10% of individuals who are receiving services are spending less than 25% of their time in community settings on average are required to clearly describe the following for the service location in the provider’s Quality Management Plan required by 55 PA Code § 6100.45 and its Action Plan:

- The number/percent of individuals not receiving at least 25% of their services in community settings,
- The number of individuals who want to increase the amount of time they spend in the community,
- Action steps for increasing time in the community for each individual identified in the previous bullet, including timeframes for achieving each action step,
- Barriers to supporting individuals with engaging in community activities, including action steps to address the barriers and timeframes for achieving each action step,
- The methods used by the provider to offer options to receive services in integrated community settings in line with each participant’s preferences, choices and interests for community activities and the frequency such services will be offered,
- Successful community experiences, such as building relationships, employment opportunities and natural supports for individuals served, and
- The staff position responsible for reviewing and updating the information demonstrating the efforts to provide exposure and opportunities to participate in community activities in the:
 - Action Plan of the Quality Management Plan, at least quarterly, and

- Quality Management Plan, at least annually.”

During the December webinar, ODP informed providers that the phrase “on average” would be a quarterly average (e.g. July-September). This meant that if a service location, over the course of a quarter, had more than 10% of the individuals receive less than 25% of their CPS/Day Habilitation time in a community setting, the service location would have to complete a QM plan for CPS/Day Habilitation. In addition, providers were instructed that part of the process for discontinuing the QM plan would be that the provider must meet the criteria in the waiver for two consecutive quarters before the provider could discontinue the plan.

Updated Guidance

ODP is providing the following updated guidance on these two specific components regarding the QM plan for CPS/Day Habilitation:

- **The phrase “on average” will be evaluated over six-month periods (semi-annual),** from July-December and from January-June. ODP understands that opportunities for community inclusion vary from month to month and season to season, and that weather in particular can disrupt the ability and desire for individuals to receive their services in the community.
- **Providers should follow ODP’s standard protocol for retiring QM plans.** The tool which includes instructions for retiring plans, titled *QM Plan End-of-Cycle Review Template*, can be found at: [Quality Management Planning and Implementation Documents – MyODP](#).

ODP will review fiscal year 24-25 CPS/Day Habilitation QM plans as part of the Quality Assessment and Improvement (QA&I) process starting fiscal year 25-26. This will give providers additional time to receive requested technical assistance related to data collection, analysis, and developing a QM plan for CPS/Day Habilitation (when required).

Data Collection Tool for CPS

In order to better support providers in tracking their data, ODP has developed a CPS/Day Habilitation version of the *QM Data Monitoring & Analysis Template* to calculate data based on the current requirements and guidance for the CPS and Day Habilitation services. Attached to this announcement is a blank version of this tool with instructions for providers to use as needed. It is also available on the MyODP CPS Resource page under the subheading *CPS Community And Day Habilitation Data Collection Tool* (found here: [MyODP - Community Participation Supports](#)). The PDF of the *QM Data Monitoring & Analysis Template – Examples* on the Quality Management Templates, Tools, & Spotlights page (found here: [MyODP - QM Templates & Tools](#)) will be updated as well to replace the current CPS example.

CONTACT:

Questions about this communication should be directed to the appropriate ODP Regional Program Office.

ATTACHMENTS:

QM Data Collection Tool for CPS and Day Habilitation (Excel)