

**ID/A Waiver Amendments Effective 1.1.25:
Consolidated, Community Living, and
Person/Family Directed Support Waivers**

All stakeholders

October 30, 2024



Agenda

- January 1, 2025
Waiver
Amendments
- Overview
of Performance
Based Contracting
- Questions



▶ Waiver Capacity



Amendment Change: Waiver Capacity

- Federal rules changed that allow waivers to cover some services when an individual is in an acute care hospital.
 - ODP clarified that when an individual is in an acute care hospital and receiving waiver services, ODP will not need to reserve (hold) the individual's waiver because they will maintain enrollment in the waiver.
- Updated language for waiver capacity for high school graduates in the P/FDS waiver.
 - AEs can reserve the waiver capacity for 180 days prior to when services are needed.

▶ Assistive Technology



Assistive Technology Overview

Assistive Technology is an item, piece of equipment, or product system, acquired commercially off the shelf, modified, or customized, that is used to increase, maintain, or improve a participant's functioning or increase their ability to exercise choice and control.

Assistive Technology services include direct support in the selection, acquisition, or use of an assistive technology device.



Assistive Technology Evaluation

Updated language to explain when an independent evaluation is required and when it is optional:

- **REQUIRED:** A device will cost \$750 or more.
- **OPTIONAL:** A device will cost less than \$750.
 - An independent evaluation can be done if the team decides it would be beneficial.
- Evaluations are included in the \$10,000 lifetime limit

An independent evaluation is an assessment to ensure the technology is appropriate to meet the individual's needs.

▶ Community Participation Support



Community Participation Support Overview



Recommendation 11: Increase Community Participation

Being involved in community life creates opportunities for new experiences and interests, the potential to develop friendships and the ability to make a contribution to the community. An inter-dependent life, where people with and without disabilities are connected, enriches all of our lives.

Community Participation Support provides opportunities and support for community inclusion and building interest in and developing skills and potential for competitive integrated employment.

Should result in active, valued participation in a broad range of integrated activities that build on the participant's interests, preferences, gifts, and strengths while reflecting their desired outcomes related to employment, community involvement.



Annual Analysis

The Community Participation Support provider must complete and update an analysis of the following **at least yearly** to support individuals to experience meaningful community inclusion:

- Strongest interests and personal preferences for community activities,
- Skills, strengths, and other contributions likely to be valuable to employers or the community, and
- Conditions necessary for successful community inclusion and/or competitive integrated employment.

▶ American Sign Language (ASL) – English Interpreter Service



ASL – English Interpreter Service

- American Sign Language (ASL) – English Interpreter service will be added to ODP's waivers effective 1/1/25.
- Interpreting is the process of conveying English in grammatically correct ASL and the process of conveying ASL in English. Interpreters maintain the role of a facilitator of communication rather than the focus or initiator of communication

1. ASSURE EFFECTIVE COMMUNICATION



Every person has an effective way to communicate in order to express choice and ensure their health and safety. All forms of communication should consider and include the individual's language preferences and use of current technology.

Locations and Providers

Where can this service be provided?

- ASL – English Interpreter services can be provided in private homes, via teleservices, and for limited activities in residential homes.



Who can provide this service?

- Providers and professionals that meet qualification criteria can provide this service through one of the following:
 - Enrolling with ODP (traditional provider)
 - An Organized Health Care Delivery System
 - A Participant-Directed Services Model

ASL Service: Payments & Limits

- The waivers will pay what the ASL – English Interpreter provider charges to the general public (vendor payment).
- The costs for this service will not count toward the annual P/FDS or Community Living Waiver caps.
- Interpreter services are limited to an average of 8 hours per day and must be billed using either 15-minute units or one-hour units

▶ Music, Art, & Equine Assisted Therapy



Music, Art, & Equine Assisted Therapies - Limits

Increasing the cumulative maximum limit of any combination of Music Therapy, Art Therapy, or Equine Assisted Therapy from 26 to 52 hours per fiscal year.



▶ Specialty Telehealth & Assessment Team (STAT)



STAT Overview

- The Specialty Telehealth and Assessment Team service was implemented in March 2024.
- The goal of the Specialty Telehealth and Assessment Team service is to provide a right-on-time telehealth assessment when the individual's primary care physician is unavailable or unable to determine the best clinical course of action, often avoiding unnecessary emergency room visits.

STAT: During Travel

- This service may be delivered to the participant during temporary travel per ODP's travel policy which is included in the Individual Support Plan Manual

▶ Waiver Corrections



10/26/2024



Pennsylvania
Department of Human Services

Life Sharing Corrections

Life Sharing:

- The following may not be authorized for participants who receive Life Sharing services: Residential Habilitation; Supported Living; ~~Respite (15-minute or Day)~~;
- Reminders:
 - Effective January 1, 2018, individuals who receive Life Sharing services are also eligible to receive discrete Respite services.
 - The Respite limitations outlined in the Consolidated and Community Living Waivers apply to individuals in Life Sharing.
 - ISP Manual and Communication 028-18

Supported Living Corrections

- The following services may not be authorized for participants who receive Supported Living services: Life Sharing; Residential Habilitation; Respite (15-minute or Day); Homemaker/Chore; In-Home and Community Supports; ~~Behavioral Supports; Therapies; Shift Nursing; Consultative Nutritional Services; Communication Specialist and Specialized~~
 - Behavioral Support, Shift Nursing, and Communication Specialist are built into the rate for Supported Living and may be authorized as separate services for limited reasons.

Residential Habilitation Qualifications Corrections

- Requirements for program specialists match licensing requirements for licensed providers.
- The Residential Habilitation provider is also responsible for providing physical health maintenance services including those required by a licensed nurse when required to assure health and wellness or as required in the service plan.



▶ Benefits Counseling

Public comment
change



Benefits Counseling Overview

The Benefits Counseling service helps individuals understand how employment might impact benefits such as Supplemental Security Income, Medicaid, Medicare, Housing subsidies and Supplemental Nutrition Assistance Program.

Over 8,000 working age people are enrolled with ODP and work.

Everyday Lives Recommendation

3. INCREASE EMPLOYMENT



Employment is a centerpiece of adulthood and must be available for every person. The benefits of employment for people with disabilities are significant and are the same as for people without disabilities.

EMPLOYMENT IS:

- Feeling proud
- Meeting new people
- Having self-confidence
- Building new skills
- Getting a paycheck
- Paying taxes



Benefits Counseling and WIPA

Benefits Counseling is also available through the Work Incentives Planning and Assistance (WIPA) program.

- This is a federally funded program.
- The purpose is to promote employment among those receiving disability benefits.

Benefits Counseling can only be provided through the waivers when there is a gap in services provided through the WIPA program or the individual is not eligible to receive services through the WIPA program. This is a federal rule.

Benefits Counseling – Indirect Activities and Limit

Before this change providers could only bill for activities when actively engaging with the individual (direct activities).

New billable indirect activities (activities performed on behalf of the individual):

- Writing a Benefits Summary and Analysis.
- Reaching out to employers to obtain work incentive and paystub information.
- Requesting or receiving a Benefits Planning Query and analyzing the Benefits Planning Query,
- Confirming information with Social Security Administration about the Benefits Planning Query and its accuracy, and
- Connecting with the Social Security Administration to complete work review.

Increase the limit from 15 hours per fiscal year to 24 hours per fiscal year

▶ Overview: Performance Based Contracting



Why Performance- Based Contracting?

- ODP is engaging in systems change to:
 - Implement the values set out in Everyday Lives
 - Improve service sustainability
 - Improve quality of services
 - Improve clinical capacity to serve individuals with complex needs
 - Implement strategies that support workforce stability and growth

Which Services will be Impacted?

- Effective January 1, 2025, Performance-Based Contracting will be implemented for the following services funded through the Consolidated and Community Living Waivers:
 - Residential Habilitation
 - Life Sharing
 - Supported Living

What will Performance-Based Contracting Change?

- Enrollment of new providers
- Implementation of:
 - Provider Performance Standards
 - Provider tiers
 - Rate add-ons for certain provider tiers
 - Pay for performance payments for providers that meet or exceed performance targets

What will Remain the Same?

- Residential providers will still be required to meet all requirements in:
 - The Consolidated and Community Living Waivers (service definitions, limits, qualification requirements, etc.),
 - Licensing requirements (when applicable),
 - Chapter 6100 requirements.
- Residential providers will still bill the daily fee schedule rate

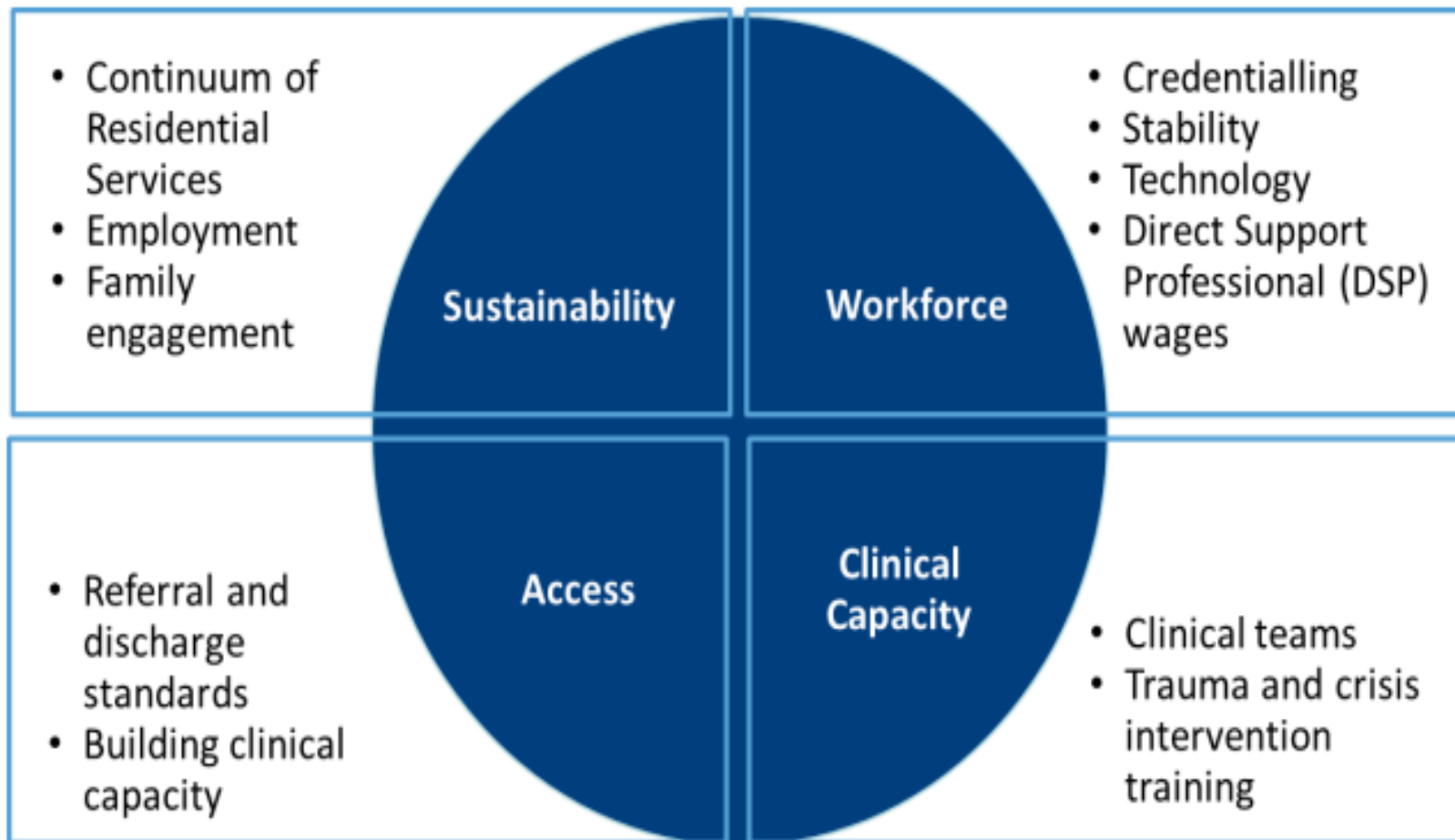
Changes to Enrollment of New Providers

The Centers for Medicare and Medicaid Services (CMS) approved a 1915(b)(4) waiver effective 1/1/25 that connects to the residential services funded through the Consolidated and Community Living Waivers.

The 1915(b)(4) waiver allows ODP to:

- Determine when new residential providers are needed, where the new residential providers are needed, and what individual needs new residential providers need to support.
- Invite new residential providers that meet these needs to qualify for enrollment through a competitive request for application process.

What are Performance Standards?



▶ What are Provider Tiers?

Annually, ODP will review provider data and documentation and assign each provider to 1 of 4 tiers:

Conditional

- One or more homes operating under a provisional or revoked license

Primary

- Meet current standards and additional measures

Select

- Provide 2 of 3 residential services
- Meet additional measures

Clinically Enhanced

- Offer clinically enhanced medical or behavioral supports
- Meet enhanced measures

What Do These Changes Mean to Individuals and Families?

- Individuals will not be required to move to a new home or new provider because of implementation of Performance-Based Contracting.
 - All currently enrolled residential providers will have the opportunity to enter into a performance-based contract with ODP.
- Individuals and families will be able to see residential provider tiers and make informed decisions based on this information.
- ODP will encourage and incentivize more residential service options in rural areas.
- The overall quality of residential services will improve.

▶ Questions?



Resources & Contact Information:

- Performance-Based Contracting webpage: [Performance-Based Contracting – MyODP](#)
- Waiver information: [Waivers | Department of Human Services | Commonwealth of Pennsylvania](#)
- [ODP Information – MyODP](#)
 - Community Participation Support
 - Gold Book
- [Supportive Technology – MyODP](#)