

# Open for Public Comment: Proposed Implementation of Performance-Based Contracting for Supports Coordination Services and Waiver Amendments to the Consolidated, Community Living, and Person/Family Directed Support Waivers

## ODP Announcement 25-041

### AUDIENCE:

All Stakeholders

### PURPOSE:

To inform all interested stakeholders of the opportunity to submit public comments on the proposed implementation of Performance-Based Contracting for Supports Coordination services and proposed additional changes to the Consolidated, Community Living, and Person/Family Directed Support (P/FDS) Waivers that are not related to Performance-Based Contracting effective January 1, 2026. **The public comment period starts on April 19, 2025, and ends on May 26, 2025, at 11:59 PM for all proposed changes in this communication.**

### DISCUSSION:

The Office of Developmental Programs (ODP) is pleased to invite public comment on:

- Performance-Based Contracting for Supports Coordination services scheduled to take effect January 1, 2026. This includes:
  - Proposed changes to the 1915(b)(4) waiver and Consolidated, Community Living, and P/FDS waivers related to Performance-Based Contracting.
  - Proposed Implementation Plan for Performance-Based Contracting for Supports Coordination.
  - Proposed rates effective July 1, 2026, for Supports Coordination Organizations that meet criteria for the Select tier.
  - Proposed changes to the Targeted Support Management State Plan.
- Additional waiver amendments (not related to Performance-Based Contracting) to the Consolidated, Community Living, and P/FDS waivers scheduled to take effect January 1, 2026.

A notice has been published in the *Pennsylvania Bulletin*, Volume 55, Number 16, published on Saturday, April 19, 2025. This notice contains an overview of Performance-Based Contracting and additional waiver changes, including how to provide comments, and can be read at [Pennsylvania Bulletin](#).

### **Overview of the Proposed Changes:**

ODP proposes to amend the 1915(b)(4) waiver to add Performance-Based Contracting of Supports Coordination services in the Consolidated, P/FDS, and Community Living Waivers and Targeted Support Management in the Medicaid State Plan. The following documents are available for review:

- Performance-Based Contracting Supports Coordination Services Proposed Implementation Plan. This document was developed to help all interested persons understand why ODP is proposing Performance-Based Contracting

for Supports Coordination services and the actions that will be taken. This document contains two attachments:

- Supports Coordination Performance Standards. In addition to meeting regulatory requirements and provider qualification requirements in the waivers, Supports Coordination Organizations will also be required to meet additional requirements called performance standards which were developed to improve the quality of services.
- Supports Coordination Minimum Activity for Billing and Documentation. This list of activities required for billing and documentation for Supports Coordination Organizations in the Select tier, are intended to create efficiencies for documentation and billing and support efforts to better align payment with quality outcomes.
- Section 1915(b)(4) Waiver Fee-For-Service Selective Contracting Program. This is the document that allows ODP to implement Performance-Based Contracting for Supports Coordination services. The 1915(b)(4) Waiver approved by the Centers for Medicare and Medicaid Services (CMS) to implement Performance-Based Contracting for residential services has been amended with proposed changes to include Supports Coordination services.
- Targeted Support Management State Plan Amendment. Targeted Support Management is provided by Supports Coordination Organizations to individuals who are eligible for Medical Assistance and who are not enrolled in a Waiver.
- Record of Change to implement Performance-Based Contracting in the Consolidated, P/FDS, and Community Living Waivers.
- Proposed fee schedule rates - Effective July 1, 2026, ODP proposes to implement monthly payments and outcome payments as outlined in the public notice.

These proposed payments will only apply to Supports Coordination Organizations that request tier determination for, and are determined to meet, the criteria for the Select Tier. The purpose of this new payment structure is to create efficiencies for documentation and billing and support efforts to better align payment with quality outcomes.

ODP proposes to implement additional changes to the Consolidated, Community Living, and P/FDS Waivers that are not related to Performance-Based Contracting. Proposed changes include:

- Supporting the use of Assistive Technology through changes to the limits for Assistive Technology.
- Increasing employment through changes to Benefits Counseling and Community Participation Support service definitions and requiring prevocational facilities to be an approved vendor for Office of Vocational Rehabilitation Supported Employment services.
- Increasing community participation by excluding buildings where most businesses located therein provide disability specific services as locations where Community Participation Support services can be rendered in new facilities licensed under 55 Pa. Code Chapter 2380 (relating to Adult Training Facilities) or Chapter 2390 (relating to Vocational Facilities).
- Expanding options for community living through clarification that Housing Transition services may be used to support participants who receive Supported Living to move from their current private home into a different private home.
- Reducing the administrative burden and cost involved in qualifying and monitoring providers that do not render services to individuals by requiring providers of Community Participation Support, In-Home and Community

Support, or Companion services to render services to a minimum of five participants each year.

- Promoting health and safety through implementation of streamlined procedures that enable faster and more efficient transitions to different models of service when a Common Law Employer in the Vendor Fiscal/ Employer Agent model of participant-directed services does not perform critical functions that creates a significant risk of death or serious injury to the participant.

**Submitting Comments:**

The proposed changes and related documents discussed in the section above are available to help all interested persons provide public comment at the following link [January 2026 Proposed Waiver Amendments for Public Comment](#).

Public comment will be accepted via email, written comments, and verbal comments during webinars. All comments received by **11:59 PM on May 26, 2025**, will be reviewed and considered for revisions to the waiver amendments submitted to Centers for Medicare and Medicaid Services (CMS) and final rates.

Comments regarding all documents in this notice should be addressed to [RA-odpcomment@pa.gov](mailto:RA-odpcomment@pa.gov) or:

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Department of Human Services, Office of Developmental Programs,  
625 Forster Street, Room 510,  
Harrisburg, PA 17120

### **Registering for Webinars:**

ODP is hosting a series of public comment webinars to provide an overview of how the Office proposes to implement Performance-Based Contracting for Supports Coordination services effective January 1, 2026. Additional proposed changes to the Consolidated, P/FDS, and Community Living Waivers that are not related to Performance-Based Contracting will also be covered.

The webinars will start with a **General Information Session on April 29, 2025, from 1:00 PM to 2:00 PM**. This general information session is designed to give interested persons the information and details needed to participate in public comment sessions. Public comment will not be accepted during this webinar. There will be time for presenters to answer questions submitted by participants. All interested individuals must [preregister](#) to attend.

ODP will then hold public comment webinars for Supports Coordination Organizations and Administrative Entities (AEs), individuals and families, as well as a general stakeholder session on the dates and times below. Registration information will be sent out on ListServes specific to each group and is included below.

**Preregistration is required.** Registered participants will have the opportunity to provide verbal comments during the session.

Audience	Date	Time	Registration Link
<b>Supports Coordination Organization/ Administrative Entities</b>	May 6, 2025	1:00-2:30 PM	Sent via ListServ. Individuals who work for these organizations may also request a registration link by emailing <a href="mailto:ra-pwodp_outreach@pa.gov">ra-pwodp_outreach@pa.gov</a> .
<b>All Stakeholders</b>	May 8, 2025	1:00-2:30 PM	<a href="#">General Stakeholder Registration</a>
<b>Individuals/ Families</b>	May 12, 2025	1:30-3:00 PM	<a href="#">Individual and Family Registration</a>

**CONTACT:**

Questions about this announcement should be directed to [ra-odpcomment@pa.gov](mailto:ra-odpcomment@pa.gov).