



Clarification on Eligibility and Enrollment for Waiver Reserved Capacity for Students Who are in School or Individuals Who are Under Age 21

ODP Announcement 25-053

AUDIENCE:

Office of Developmental Programs' (ODP) Administrative Entities (AEs), Providers, and Supports Coordination Organizations (SCOs)

PURPOSE:

This clarification is provided to assist SCOs and AEs in properly identifying and planning for individuals who may be eligible for enrollment in the Person/Family Directed Support (P/FDS) Waiver through reserved capacity provisions.

DISCUSSION:

Eligibility Overview for High School Graduate Reserved Capacity

Waiver Reserved Capacity Use

- AEs must continue to reserve waiver capacity for high school students who are not eligible to complete a full year of education in their final year (e.g., those aging out before the end of the school year). This does not include the extension until age 22. AEs should continue to enroll at age 21.

- Individuals that do not meet emergency Prioritization of Urgency of Need for Services (PUNS) criteria can still be enrolled under reserved capacity as outlined in the P/FDS Waiver.

NOTE: Per the Pennsylvania Department of Education, students eligible under the federal Individuals with Disabilities Education Act (IDEA) are entitled to a Free and Appropriate Public Education (FAPE) until their 22nd birthday. This means a student who would typically exit high school during or after the school year in which they turn 21 may now remain enrolled until age 22. This does not change how AEs offer P/FDS capacity at age 21.

Emergency Need vs. Reserved Capacity

- Individuals identified through the High School Graduate initiative do not need to meet the criteria for emergency need (as defined in PUNS or its successor) but are still eligible for waiver services through reserved capacity.
- Reserved capacity enrollment is permitted up to 180 days prior to the anticipated need for services, such as graduation or school exit.
- This early planning ensures timely access to services at transition points.

The High School Graduate Reserved Capacity does not preclude the prioritization of individuals who are younger than 21 years and have an emergency PUNS. Individuals who meet emergency criteria should continue to be prioritized for waiver enrollment consistent with existing ODP policies regardless of their age.

CONTACT:

Any questions regarding this communication, please reach out to the regional waiver capacity manager.