



Billing Guidance for Community Participation Support (CPS) Facility Procedure Codes for Provider Specialty 525 and Planning & Coordination

ODP Announcement 25-087

AUDIENCE:

- CPS Providers
- Supports Coordination Organizations (SCOs)
- Administrative Entities (AEs)

PURPOSE:

This communication is intended to inform 100% community location-based CPS providers (Specialty 525) of CPS Facility procedure codes available in HCSIS to permit billing for groups of more than 3 individuals, and to provide guidance on the planning and coordination component of the CPS service.

DISCUSSION:

CPS Facility Codes in HCSIS for Specialty 525

Many CPS community providers also provide CPS Facility in licensed 55 Pa. Code Chapter 2380 (Adult Training Facility) and/or Chapter 2390 (Vocational Facility) service locations. However, there are some CPS providers that only provide CPS in community locations and

are commonly referred to as 100% community providers. The CPS service definition states that CPS providers must bill CPS facility procedure codes when more than three individuals receive CPS in the same community location at the same time, and when more than six individuals receive CPS in the same community hub at the same time.

To assist CPS Community providers who provide CPS only under Provider Type 51, Specialty 525, the following procedure codes are allowable for that specialty when group sizes exceed community location limitations:

- W7226: CPS Facility 1:4-1:6 (Including the U1 Modifier)
- W7223: CPS Facility 1:7-1:10 (Including the U1 Modifier)

Planning & Coordination Billing Guidance

Effective and meaningful CPS services often require individualized planning and coordination to ensure the service is in alignment with an individual's preferences and goals. The CPS service definition permits CPS providers to bill for indirect "planning and coordination" as follows:

"CPS includes planning and coordination for:

- Developing skills and competencies necessary to pursue competitive integrated employment
- Promoting personal reliance and contribution, mutual support, and community connection
- Developing social networks and connections within local communities
- Emphasizing, promoting, and coordinating the use of unpaid supports to address participant & family needs in addition to paid services

- Planning & coordinating a participant's daily/weekly schedule for CPS.”

ODP Announcement 24-040: Now Available: Version 4 of the Community Participation Support (CPS) Question and Answer (Q&A) Document contains the following guidance for billing Planning and Coordination

“REVISED Q48. The definition for CPS references “planning and coordination” as part of the service. Does this mean we can bill for planning and coordination if the individual is not present for those activities?

Answer: Yes, planning and coordination is a billable component of the service. All of the following conditions must be met and documented by the provider:

- It is distinct from and not duplicative of required planning activities of program specialists, including participation in Individual Support Planning (ISP) meetings
- It specifically reflects one or more of the planning or coordination activities listed in the service definition for the specific individual
- It meets all the requirements for claims documentation
- It is billed at the lowest facility staffing that is authorized in the individual’s plan

Providers may bill for each individual for whom the planning and coordination service is utilized. For example: If a program specialist plans for a community activity in which three individuals will take part, the provider may bill for planning and coordination for all three individuals at no lower than a 1:3 facility ratio, assuming that all three individuals have sufficient units in their plans.

The Office of Developmental Programs (ODP) expects that this component of the service will be utilized judiciously, and ODP will carefully monitor billings for this component of the service. Providers should note that use of this component of

the service will lower the individual's percentage of time spent in the community, because planning and coordination is only able to be billed using facility units.

ISP teams should also be mindful of the potential financial effect of using units for planning and coordination on individuals in waivers with annual fiscal limits (Person/Family Directed Support [P/FDS] or Community Living)."

If procedure codes need to be added to an individual's ISP as a result of the guidance in this communication, CPS Community providers (Specialty 525) without licensure for Specialties 514 or 515 must contact the SC to request a team meeting to discuss adding the appropriate codes to the ISP. In addition, the ISP Manual (Updated 1/24/25, pg. 79) requires CPS providers to do the following regarding planning and coordination:

- "When a provider requests separate or additional units of planning and coordination, they must describe in detail how this will achieve and/or enhance the individual's community-based outcome(s) connected to the CPS service. The SC should indicate the specific number of CPS units requested and at what frequency the provider intends on using it. Please note that all planning and coordination must be billed using CPS facility procedure codes."

Generally, the facility procedure codes to be added and authorized in ISPs for Specialties 514 or 515 will correspond with the number of people for whom planning and coordination activities occur. Planning and coordination activities for one to three individuals can be authorized as either W7226 or W7223 taking into consideration all the factors in Announcement 24-040 above. Providers cannot bill for the provision of direct services and the provision of planning and coordination activities on the same dates and times for an individual.

Additionally, it is allowable for a CPS provider to utilize planning and coordination for CPS provided via teleservices when all criteria in this communication are met.

Alternatively, a CPS provider can utilize teleservices in order to directly engage one or more individuals in the planning and coordination of activities. Whenever a CPS provider directly engages with one or more individuals for this purpose, the provider bills as they would for any other direct service. As with any use of teleservices to deliver CPS, the provider must follow the general teleservices requirements outlined in the “Teleservices” section of the ISP Manual, **as well as** the specific requirements for providing CPS using teleservices which can be found in the CPS service definition in the CPS section of the ISP Manual.

CONTACT:

Questions about this communication should be directed to the appropriate ODP staff:

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