



## Provider Qualification Requirements for Community Participation Support, In-Home and Community Support, and Companion Services

### ODP Announcement 25-111

#### AUDIENCE:

Current and Future Providers of Community Participation Support (CPS), In-Home and Community Support and/or Companion Services, in the Consolidated, Community Living, and Person/Family Directed Support (P/FDS) Waivers

Supports Coordination Organizations (SCO)

Administrative Entities (AE)

Individuals and Families

All Other Interested Parties

#### PURPOSE:

To clarify new qualification requirements for providers of CPS, In-Home and Community Support and/or Companion services in the Consolidated, Community Living, and P/FDS Waivers that were recently approved by the Centers for Medicare and Medicaid Services (CMS). These requirements do not apply to services rendered by Support Service Professionals through a Participant-Directed Services option.

## DISCUSSION:

### Background

Amendments to the Consolidated, Community Living, and P/FDS Waivers effective January 1, 2026, were approved by CMS on October 15, 2025. These amendments include the following provider qualification requirements:

- “Providers newly enrolling to render Community Participation Support, In-Home and Community Support, and/or Companion must provide Office of Developmental Programs (ODP) home and community-based services to a minimum of 3 separate and distinct participants in the first fiscal year after enrollment.
- Starting 7/1/26, currently enrolled providers must render ODP home and community-based services to a minimum of 3 separate and distinct participants each fiscal year. ODP will use the provider’s Master Provider Index number to determine if the provider is rendering any ODP waiver services to a minimum of 3 separate and distinct participants.
- Additionally, the provider must render ODP home and community-based services each quarter.”

These requirements were added to expand availability of CPS, In-Home and Community Support, and Companion services to individuals and families who need them. These three services are the most frequently used and requested services, and it is often reported to ODP that participants have an unmet need for 1 or more of these services because they are unable to find providers to deliver services when they need them.

ODP currently has over 150 providers enrolled to provide CPS, In-Home and Community Support, and/or Companion services that serve less than 3 individuals; additionally, approximately 50 of these providers do not deliver 1 or more of these services to *any* ODP participants.

The process outlined in the provider qualification section of the waivers and this announcement gives providers time to plan, expand delivery of services to meet the needs of the population, and come into compliance with this new requirement.

### **Measuring Compliance**

On or after July 1, 2027, ODP will review billing data from PROMISe for each CPS, In-Home and Community Support, and/or Companion provider for fiscal year 2026-2027 to determine if the following requirements are met:

**Requirement 1:** The provider rendered any ODP waiver service to at least 3 separate and distinct participants at any time during the full fiscal year, and

**Requirement 2:** The provider rendered waiver funded CPS, In-Home and Community Support, or Companion services to at least 1 participant during each quarter of the fiscal year.

### **Key points:**

- ODP will review provider data by Master Provider Index Number (MPI) for both requirements. If a provider agency renders different services using different MPIs, the services will not be grouped together to determine compliance. Compliance is determined by MPI.
- The provider must serve at least 3 separate participants during each fiscal year. Providing 3 different services for 1 participant will **not** satisfy Requirement 1.
- Any ODP waiver service delivered to any participant under the same MPI that CPS, In-Home and Community Support, and/or Companion is delivered will be counted towards compliance for Requirement 1. ODP waiver services include any service funded through one of the following:
  - Consolidated Waiver
  - Community Living Waiver

- P/FDS Waiver
- Adult Autism Waiver<sup>1</sup>

### **Requirement 1: Serve 3 Participants Each Fiscal Year**

Providers that start to provide CPS, In-Home and Community Support and/or Companion services for the first time **on or after** 1/1/26 (the effective date of the waiver amendment) have until the following fiscal year to meet the standard of serving 3 people.

- **Example 1:** A provider that starts to provide In-Home and Community Support for the first time on 2/8/26 must meet the standard of serving 3 participants in fiscal year 2026-2027. This means the standard must be met no later than 6/30/27.
- **Example 2:** A provider that starts to provide Companion and CPS on 7/24/26 must meet the standard of serving 3 participants in fiscal year 2027-2028. This means the standard must be met no later than 6/30/28.

For purposes of this requirement, the date a provider “starts to provide” CPS, In-Home and Community Support and/or Companion services is the “Date of Determination” on Form DP-1059.

Providers rendering CPS, In-Home and Community Support, and/or Companion **prior to** 1/1/26 will be required to meet the standard of serving 3 participants starting in fiscal year 2026-2027. This means the standard must be met no later than 6/30/27 and each subsequent fiscal year.

- **Example 1:** A provider serves 2 participants in In-Home and Community Support and 1 in Supported Employment under the same MPI number in fiscal year 2026-2027.

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<sup>1</sup> Services billed through the Adult Autism Waiver count toward meeting the provider qualification requirements 1 and 2 (outlined above) in the Consolidated, Community Living and P/FDS Waivers. The qualification criteria outlined in this announcement do not apply to the Adult Autism Waiver.

The provider meets the requirement of serving 3 participants in fiscal year 2026-2027.

- **Example 2:** A provider has one MPI for CPS and a different MPI for In-Home and Community Support. The provider delivers CPS to 2 participants and In-Home and Community Support to 2 participants in fiscal year 2026-2027. Since each MPI is evaluated independently, the provider does not meet the requirement to serve 3 participants in fiscal year 2026-2027 for CPS and for In-Home and Community Support.

Any provider of CPS, In-Home and Community Support, and/or Companion services that does not serve 3 or more participants within the timeframes outlined in this communication will not be qualified to provide the applicable services (CPS, In-Home and Community Support and/or Companion) through the Consolidated, Community Living, and P/FDS Waivers. The Individual Support Plan team will then be required to plan for the transition of any participants receiving services to a qualified service provider or one of the participant-directed services models (Agency With Choice or Vendor Fiscal/Employer Agent). Transition planning must comply with 55 Pa. Code §§6100.301 – 302 and §§6100.305 – 307.

#### **Requirement 2: Render Services for at Least 1 Participant During Each Quarter of the Fiscal Year.**

This requirement applies to providers that are only qualified to render CPS, In-Home and Community Support, and/or Companion services (i.e. the provider is not qualified to render any other ODP waiver services in addition to CPS, In-Home and Community Support, or Companion).

If ODP's analysis finds that a provider of CPS, In-Home and Community Support and/or Companion services **did not render at least one of these services** (CPS, In-Home and Community Support, or Companion) to any participant in one or more quarters in fiscal year

26-27, the provider will be required to complete a Corrective Action Plan in accordance with 55 Pa. Code § 6100.42 (relating to Monitoring Compliance).

ODP recognizes that provider compliance may vary from quarter to quarter, e.g., a provider may serve no participants in the first quarter, 1 participant in the second quarter, and so on. However, if no participants are served in any single quarter in fiscal year 2026-2027, the provider will be required to complete a Corrective Action Plan to ensure long-term, sustained compliance over time.

If the provider fails to complete their Corrective Action Plan such that the provider does not render CPS, In-Home and Community Support, or Companion services to any participants within the first 90 calendar days of fiscal year 2027-2028, the provider will no longer be qualified to provide the applicable service(s) through Consolidated, Community Living, and P/FDS Waivers.

The Individual Support Plan team will then be required to plan for the transition of any participants receiving services to a qualified service provider or one of the participant-directed services models (Agency With Choice or Vendor Fiscal/Employer Agent). Transition planning must comply with 55 Pa. Code §§6100.301 – 302 and §§6100.305 – 307.

- **Example 1:** A provider is qualified to render CPS and Residential Habilitation. Requirement 2 does not apply to this provider because they are qualified to render Residential Habilitation in addition to CPS.
- **Example 2:** A provider is solely qualified to render In-Home and Community Support services. This provider does not render In-Home and Community Support to any individuals in the first quarter of fiscal year 2026-2027 (July 1, 2026 through September 30, 2026). The provider then delivers In-Home and Community Support services to 2 individuals in the second quarter and 3 individuals in the third and fourth quarters. This provider will need to complete a Corrective Action Plan

because they did not meet Requirement 2 in the first quarter of fiscal year 2026-2027.

**CONTACT:**

Questions about the information in this announcement may be directed to the ODP provider qualification mailbox at [ra-odpproviderqualif@pa.gov](mailto:ra-odpproviderqualif@pa.gov).