



# ODP Announcement

## Community Participation Support ISP FY 18-19 Renewal Template

**ODP Communication Number: 029-18**

*The mission of the Office of Developmental Programs is to support Pennsylvanians with developmental disabilities to achieve greater independence, choice and opportunity in their lives.*

**AUDIENCE:** Providers of Community Participation Support in the Consolidated, Person/Family Directed Support and/or Community Living Waivers, Administrative Entities (AEs), Supports Coordination Organizations (SCOs), and Supports Coordinators (SCs).

**PURPOSE:** The purpose of this announcement is to release a Community Participation Support (CPS) template to assist in addressing both CPS authorization issues for Fiscal Year (FY) 17-18 and CPS authorization needs for FY 18-19 Individual Support Plan (ISP) renewals.

### **DISCUSSION:**

Providers of CPS should complete the attached form for all individuals to whom they provide CPS services.

The intent of the form is two-fold: (1) for ODP to understand the scope of provider concerns about implementation of CPS in FY17-18 and Individual Support Plans (ISPs) not containing all necessary authorizations for billing purposes; and (2) to provide a communication tool for CPS providers, SCOs, SCs and AEs on the CPS FY renewal ISP authorizations that will be needed for each individual who will receive CPS for FY18-19.

### **Providers**

Providers should complete the following steps:

1. Complete the attached template (*Attachment A*) for each individual the agency serves in CPS as per the instructions included in the template.
2. **Send files for FY18-19 to SCOs.** The SCOs will need each provider's file for FY18-19. When the template is complete, sort the FY18-19 tab by SCO and send the appropriate

file to each SCO supporting the individuals to whom the provider will render CPS. *Attachment B* includes the SCO Director emails.

3. Send a copy of the complete file (FY17-18 tab and FY18-19 tab) of all individuals the provider serves to ODP at [ra-ratesetting@pa.gov](mailto:ra-ratesetting@pa.gov)
4. **Files should be sent to SCOs and ODP by April 20, 2018.** (ODP will send the file to AEs by April 24, 2018.)

### **Supports Coordination Organizations and Administrative Entities**

Once the SC/SCO receives the completed CPS template(s) from providers, the SC/SCO should use the provided data to guide the FY18-19 renewals for CPS services and follow the guidelines below related to ISP team meetings and include the necessary procedure codes and total units in ISPs.

If the SC already completed the FY18/19 renewals and the information provided by the CPS provider does not match the ISP, and a change is needed, a critical revision must be completed.

AEs should use the provided data for FY renewal plan review, approval and authorization to ensure that the CPS authorizations needed by individuals are included in their ISPs.

### **ISP Team Meeting Requirements**

When a provider, on behalf of an individual, requests through the template to change the percentage of time the individual spends in community locations in CPS service (moving units between <25% CPS, 25% CPS, 50% CPS, 75% CPS), the following guidance applies:

If the change requested by the individual meets the following criteria, then an ISP team meeting *is not* required and the SC is not required to issue Advanced Written Notice:

The requested change:

- Is a reallocation of previously authorized CPS units and does not increase or decrease the frequency and/or duration of the CPS service (for example, moving units between <25% and 50%);
- Does not impact the P/FDS Waiver cap as described below or the Community Living Waiver cap; and
- Does not increase or decrease staffing ratios.

*ODP does encourage ISP team discussion to ensure that services, service locations, and supports are best aligned with the individual's needs, interests, and preferences, but a meeting is not required.*

An ISP team meeting *is required* to discuss change requests related to the percentage of time if any of the following circumstances apply:

- The request also reflects a change in need which results in a change in staffing ratios for either the community or facility locations.
- The requested change will result in the plan exceeding the P/FDS Waiver cap, the approved P/FDS individual cap exception amount, or Community Living Waiver cap. In such a situation, Advanced Written Notice or notice of hearing and appeal rights would be issued if other services would be decreased or terminated to accommodate the proposed change.

**Guidance on Authorizations for CPS - Multiple Service Codes on a Plan:**

For many individuals accommodating variations in scheduled activities, accounting for weather and/or intermittent health issues, it will be necessary to include more than one CPS procedure code in the ISP. Circumstances that would require multiple procedure codes include but are not limited to:

- Different staffing ratios based on activity and need.
  - For example, the individual typically will be supported at a 1:2 or 1:3 ratio in community locations but there is an activity that occurs once weekly for which the individual will need 1:1.
- Fluctuations in schedule that mean the individual may spend more time in community locations seasonally or based on activity.
  - For example, the individual who typically is supported in the 0 to <25% of time in community range got a part in a play put on by a community theater group and will require support in community locations 25-49% of the time for 3 months.
- Accounting for an individual who may typically spend a high percentage of time in community locations when feeling well but misses planned activities frequently and/or spends time in the facility setting when not feeling well.

***To minimize the number of critical revisions necessary to ISPs for the CPS service, SCs may calculate additional units of service for each procedure code in order to provide a cushion (up to approximately 10% over the expected number of units for each procedure code). Total authorizations may not exceed the P/FDS and Community Living Waiver caps or an approved P/FDS individual cap exception.***

Questions related to this announcement should be directed to ODP's Rate Setting mailbox: [ra-ratesetting@pa.gov](mailto:ra-ratesetting@pa.gov)