

Coronavirus Disease 2019 (COVID-19): Guidance for Individual Support Plans That Are Effective Through June 30, 2021 ODP Announcement 21-006

AUDIENCE:

Supports Coordination Organizations (SCOs), Administrative Entities (AEs), Providers, and Other Interested Parties

PURPOSE:

To communicate guidance for services included in Individual Support Plans (ISPs) that are effective through June 30, 2021 for individuals enrolled in the Consolidated, Community Living, Person/Family Directed Support (P/FDS) or Adult Autism Waiver.

DISCUSSION:

The flexibilities for services rendered through the Consolidated, Community Living, Person/Family Directed Support (P/FDS) and Adult Autism Waivers, which are specified in the Operational Guide and were approved by the Centers for Medicare and Medicaid Services (CMS) in Appendix K, expire on March 10, 2021. The Office of Developmental Programs (ODP) has received inquiries regarding whether changes are needed to services included in ISPs rendered on or after March 11, 2021 to end date the flexibilities so that ISPs comply with the current approved Waivers.

On December 22, 2020, CMS issued a letter directed to [State Health Officials](#) informing states that they may complete a new Appendix K if they want to continue waiver flexibilities. Waiver flexibilities may be continued for no longer than six months after the end of the public health emergency. ODP will be submitting a new Appendix K to enable the flexibilities specified in the Operational Guide to remain in effect through at least June 30, 2021.

[Individual Support Plans](#)

- For current ISPs that contain an end date of March for any flexibility that continues to be allowable and is needed by the participant, revisions should be completed to extend the end date as needed, but no later than June 30, 2021. For new ISPs, or ISPs where participants need to utilize the flexibilities for the first time, the flexibilities specified in the Operational Guide may be included in the ISP with an end date of no later than June 30, 2021.
- For current ISPs that contain services that the ISP team agrees will not be utilized between now and June 30, 2021, these services should be removed or end dated in the ISP. Pursuant to CMS guidance, participants must not be disenrolled from the Consolidated, Community Living or P/FDS waiver if this causes the participant to have an ISP with no services authorized except Supports Coordination through June 30, 2021.
- The total number of day units of Residential Habilitation for participants enrolled in the Consolidated Waiver should not exceed 400 in the ISP for the year. Allowing the ISP to contain more than 365 day units per year minimizes critical revisions related to calculations of Residential Habilitation “with day” and “without day” caused by unanticipated circumstances.
- For the Consolidated, Community Living, and P/FDS waivers, ODP encourages ISP teams to delay completion of ISPs for Fiscal Year 2021-22 until guidance is published regarding the development of ISPs that will cover this timeframe. For the Adult Autism Waiver, Annual Review Plans (ARP) should continue to be completed in the established timeframes.

ODP CONTACT INFORMATION:

Questions or comments can be directed to the appropriate ODP Regional office.