

**From:** Brown, Holly M <holly.brown@mercer.com>  
**Sent:** Thursday, March 31, 2022 5:38 PM  
**To:** Ahrens, Kristin; Smith, Rick  
**Cc:** Beckman, Misti; Wahlman, Jason; Brown, Holly M  
**Subject:** [External] RE: April 2022 Rate Comment and Response Summary and Assumption Logs

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Hi Kristin,

As we discussed on Tuesday, Mercer is working to update select assumptions for the 'Remote CPS', 'Family Medical Support' and 'Life Sharing for Medically Complex Conditions' services to align certain items with those used in the FY 21-22 rate refresh. I wanted to provide an overview of the updates we are applying and let you know a couple of preliminary observations for each service. We also have some questions for ODP below.

#### Summary of Fee Range Updates for New Services

- For all three services, we are:
  - Updating wages using the 3.5% trend factor to the midpoint of FY22
  - Updating ERE
  - Updating PTO to 10-25 days; 11 federal holidays
  - Updating training days to 10 training days + 3 new hire training days at 24% turnover (previously assumed different number of days for each service)
- In the preliminary results for each of these services, all of the ODP selected fees are falling within the updated fee ranges.

#### **Questions for ODP:**

1. Each of these services currently had a FT/PT assumption of 80%/20% -- many of the other non-residential services use 75%/25% (except for Companion and IHCS) and Life Sharing uses 75%/25%.
  - Does ODP want to change this FT/PT assumption to 75%/25% for Remote CPS, Family Medical Support and Life Sharing for Medically Complex Conditions?
  - We do not anticipate a material impact to the fees for this assumption change.
2. Please confirm that ODP needs enhanced communication rate ranges calculated for each of these services.
3. Can ODP confirm if 'Family Medical Support' and 'Remote CPS' will be added to AAW? If so, we will update the AAW assumption log.

Thank you,  
Holly

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A business of Marsh McLennan

**From:** Brown, Holly M

**Sent:** Tuesday, March 29, 2022 11:02 AM

**To:** 'Smith, Rick' <[REDACTED]>

**Cc:** 'kahrens@pa.gov' <[REDACTED]>; 'Beckman, Misti' <[Misti.Beckman@mercer.com](mailto:Misti.Beckman@mercer.com)>; Wahlman, Jason <[jason.wahlman@mercer.com](mailto:jason.wahlman@mercer.com)>; 'jmochon@pa.gov' <[REDACTED]>

**Subject:** RE: [External] RE: April 2022 Rate Comment and Response Summary and Assumption Logs

Hello – I wanted to send an update as Julie provided clarification for #1 below shortly after I sent this email (attached). However, the selected fees for Remote CPS are based on the modeled ranges from June 2021 (wage range of \$12.78-\$24.08) and other assumption levels that are not consistent with the recent ID/A FY 21-22 refresh. **Kristin**, you noted below that you were looking to update the assumptions and modeled fee ranges to align with those from the ID/A FY 21-22 refresh. Please confirm if this is the case – if so, I'd like to touch base as this will require additional steps to model new fee ranges for these services.

Also, please provide information for #2 below to inform the AAW log updates when you can.

Thanks!

**Holly Brown**

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**From:** Brown, Holly M

**Sent:** Tuesday, March 29, 2022 10:25 AM

**To:** Smith, Rick <[REDACTED]>

**Cc:** 'kahrens@pa.gov' <[REDACTED]>; Beckman, Misti <[Misti.Beckman@mercer.com](mailto:Misti.Beckman@mercer.com)>; Wahlman, Jason <[jason.wahlman@mercer.com](mailto:jason.wahlman@mercer.com)>

**Subject:** RE: [External] RE: April 2022 Rate Comment and Response Summary and Assumption Logs

Hi Rick –

In response to your request last week for assistance in this process, we did ask some questions and for ODP to provide the fees that will be going in place on April 1 so we could confirm that the correct service assumptions are matching the fee ranges/selected fees. We did not receive any feedback or the requested information from ODP so we went ahead and updated the logs for I/DA and AAW (matching the information in Julie's request below) in an effort to meet your 3/28 deadline.

1. There is confusion on the "Remote CPS/Day Habilitation" service since there are two services that are similar. We originally developed "CPS Remote" rates last summer with two levels based on staffing ratios (see attached June 2021 assumption log and fee ranges). We also developed rates for "CPS On-Call and Remote Support" for the ID/A FY 21-22 refresh we completed earlier this year.

- a. Are these the same services or different services?
  - b. Which one is ODP implementing in the waivers (or both)?
  - c. If both, you can see that the timing of the fee development and assumptions are different.
2. Also, please confirm that both “Family Medical Support Assistance” and “Remote CPS/Day Habilitation” are **not** being added to AAW.
- d. If this is the case, the original assumption log for AAW should not need any updates.

If ODP can share the added services and fees for April 2022 in each waiver, that would be helpful so we can resolve the miscommunication. Please let me know who we should connect with to obtain additional context for the request so we can adjust the logs as needed.

Thanks,  
Holly

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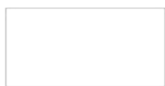
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**From:** Smith, Rick <[REDACTED]>  
**Sent:** Tuesday, March 29, 2022 8:43 AM  
**To:** Brown, Holly M <[holly.brown@mercer.com](mailto:holly.brown@mercer.com)>; Wahlman, Jason <[jason.wahlman@mercer.com](mailto:jason.wahlman@mercer.com)>  
**Subject:** Fwd: [External] RE: April 2022 Rate Comment and Response Summary and Assumption Logs

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Apologies, I am trying to coordinate this while on vacation. Please see Kristin comments below. I do not think we are adding remote CPS to AAW.

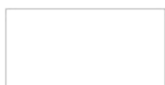


**From:** Ahrens, Kristin [redacted] >  
**Sent:** Tuesday, March 29, 2022 4:56 AM  
**To:** Yale, Jeremy [redacted]; Mochon, Julie [redacted]; Smith, Rick [redacted]  
**Subject:** FW: [External] RE: April 2022 Rate Comment and Response Summary and Assumption Logs

I think Mercer missed the point – they were not just to consolidate the assumption logs but to update the assumptions with the data used this fall. From the wages, it doesn't look like they did that. Right?  
 so, we are **not** adding · Added "Family Medical Support Assistance" (consistent with those Mercer provided to ODP in June 2021) to the AAW  
 ie, I don't know about remote CPS in AAW. Are we adding it there too?

the CPS wages for Remote CPS should be the same as the recent update  
 Rick, this needs correction immediately so we can publish the April amendments and rates. Can you work with Holly or need me to?

**From:** Smith, Rick <[redacted]>  
**Sent:** Monday, March 28, 2022 8:44 PM  
**To:** Mochon, Julie [redacted]; Ahrens, Kristin [redacted]; Yale, Jeremy [redacted]  
**Subject:** Fwd: [External] RE: April 2022 Rate Comment and Response Summary and Assumption Logs



**From:** Brown, Holly M <[holly.brown@mercer.com](mailto:holly.brown@mercer.com)>  
**Sent:** Monday, March 28, 2022 1:00:53 PM  
**To:** Smith, Rick [redacted] >  
**Cc:** Wahlman, Jason <[jason.wahlman@mercer.com](mailto:jason.wahlman@mercer.com)>; Brown, Holly M <[holly.brown@mercer.com](mailto:holly.brown@mercer.com)>  
**Subject:** [External] RE: April 2022 Rate Comment and Response Summary and Assumption Logs

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Hi Rick,

Attached please find the updated Assumption Log files for the ID/A Residential, ID/A Non-Residential and Adult Autism Waiver, revised to include the new April 2022 services as ODP requested below. The files are updated as follows:

**ID/A Non-Residential Log:**

Added "Family Medical Support Assistance" (consistent with those Mercer provided to ODP in June 2021)  
 Added "Remote CPS/Day Habilitation" (consistent with those Mercer provided to ODP in June 2021). We assumed that this service was different from the "CPS On-Call and Remote Support" service as both are listed in the attached log (see page 1 and page 19)  
*Note that we did not list the procedure codes for these two new services.*

**ID/A Residential:**

Added "Medically Complex Life Sharing" (consistent with those Mercer provided to ODP in June 2021)  
 Added "Transition to Independent Living payments" (consistent with the Life Sharing (over 30 hours per week on average) service for SIS Group 1, 2-person home, provided to ODP in February 2022)

**Adult Autism Waiver Log:**

Added "Family Medical Support Assistance" (consistent with those Mercer provided to ODP in June 2021)  
 Added "Remote CPS/Day Habilitation" (consistent with those Mercer provided to ODP in June 2021).

Please let us know if you have any questions or need anything else.

Thanks,  
Holly

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**From:** Smith, Rick [REDACTED] >  
**Sent:** Wednesday, March 23, 2022 4:16 AM  
**To:** Wahlman, Jason <[jason.wahlman@mercer.com](mailto:jason.wahlman@mercer.com)>; Brown, Holly M <[holly.brown@mercer.com](mailto:holly.brown@mercer.com)>  
**Subject:** Fwd: April 2022 Rate Comment and Response Summary and Assumption Logs

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Hi,  
If you could incorporate the below items into the existing rate assumption logs and get them over to us by the 28th, that would be swell.  
Thanks



**From:** Mochon, Julie [REDACTED] >  
**Sent:** Monday, March 14, 2022 10:57 AM  
**To:** Ahrens, Kristin [REDACTED] >; Smith, Rick [REDACTED] >  
**Cc:** Yale, Jeremy [REDACTED] >; Cipriani, Laura [REDACTED] >  
**Subject:** April 2022 Rate Comment and Response Summary and Assumption Logs

Hi Rick and Kristin. Please find attached for your review, the comment and response summary for rates impacted by the waiver

amendments currently being reviewed by CMS. If we are trying to get the rates published in the Pennsylvania bulletin on 4/2, we should have this finalized by **COB 3/28** to have it available on the DHS webpage by Friday 4/1.

Other items that we need by **COB 3/28** are the finalized rate assumption tables. If Mercer could incorporate them into the rate assumption tables with all the other currently approved services, that would be ideal.

- Medically Complex Life Sharing and Transition to Independent Living payments in the [Residential Assumptions Log](#)
- Family Medical Support Assistance and Remote CPS/Day Habilitation in the [ID/A Select Community-Based Assumptions Log](#) and [Adult Autism Waiver Assumptions Log](#)