

**From:** Brown, Holly M <holly.brown@mercer.com>  
**Sent:** Friday, September 24, 2021 9:58 AM  
**To:** Smith, Rick  
**Cc:** Wahlman, Jason; Brown, Holly M  
**Subject:** [External] RE: IDA Rate Refresh Request - Residential Survey

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Hi Rick,

Could you send us the list of providers (with provider ID) that participate in the workgroup so we can identify them in the claims data? Please let us know when you might be able to get us that information.

Thanks,  
Holly

**Holly Brown**

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**From:** Brown, Holly M <holly.brown@mercer.com>  
**Sent:** Tuesday, September 21, 2021 1:33 PM  
**To:** Smith, Rick [REDACTED]  
**Cc:** Wahlman, Jason <jason.wahlman@mercer.com>; Karsten, Robert <Robert.Karsten@mercer.com>; Beckman, Misti <Misti.Beckman@mercer.com>; Brown, Holly M <holly.brown@mercer.com>  
**Subject:** RE: IDA Rate Refresh Request - Residential Survey

Hi Rick,

In follow-up to your request below, we have listed a few questions for ODP's consideration – along with a couple of options for how to analyze new data related to residential habilitation direct care staffing hours. Overall, we don't think that using 2016 survey data alongside current data is going to give ODP much helpful information since there will likely be many cases where situations have changed in the last five years (e.g., where members no longer reside in the same home or provider homes have shifted since 2016). Instead, we have laid out options below using recent data only – comparing new direct care hour results to those from the 2016 analysis.

Each option presented below has pros and cons that need to be weighed by ODP. ODP will want to consider discussions you all have had to date internally within DHS as to the goals and methods to use in this fee development process, as well as discussions you've held with the provider workgroup. For example:

- Survey submissions are not validated/audited in any way
- Collecting data only from the provider workgroup members creates an opportunity for these specific providers to heavily influence fee assumptions and potential fee changes
- Determining whether Chapter 61 regulations will be met with only surveying a subset of providers. We recognize that opening up

the survey to all providers will extend the timeline beyond what is available for a January 1 implementation date, but there may be options to expand the survey collection group, if needed, to meet regulation requirements.

To identify the best way to leverage old and new data, we went back and reviewed the 2016 Residential Setting Survey data and the analysis that was completed with the SIS data available at the time. The main questions we have for ODP regarding these approach options are as follows:

1. Do the provider workgroup members capture all residential setting, staffing level and SIS group combinations to allow ODP to evaluate every residential habilitation staffing hour assumption?
2. Are these provider workgroup members on the higher end of staffing as compared to others in the community?
3. What is the residential habilitation utilization for each of the providers in the workgroup in recent years?
4. Are all of the provider associations represented in the workgroup? If not, which are not represented?
5. Will collecting survey data from a subset of providers meet Chapter 61 regulations?

There are two options we have identified for a direct care staffing hour analysis, to use recent data to inform any residential habilitation hour assumptions for fee development. Both options allow for the use of more recent data and staffing information. We will need to discuss these options further with you as either will require a good amount of effort for Mercer and ODP.

## Options

Option 1: Collect updated survey data from Provider Workgroup Members and review recent Residential Habilitation claims utilization  
Under this option, Mercer would combine SFY 2019/2020 claims data for Residential Habilitation services (by setting and SIS group) and the updated residential survey data, specifically for the provider workgroup members, to calculate staffing hours. We would then compare these updated direct care hour results to those from the 2016 analysis by setting and SIS group.

- The main advantage of this option is that it includes a small number of providers so the data collection and analysis time would be quicker than in Option 2 below.
- ODP will need to consider if this limited process meets Chapter 61 regulations, and depending on the responses to the questions above, whether the provider group is representative enough of the PA residential community.

Option 2: Collect updated survey data (using a more aggregated version of the survey) for all, or a larger proportion of, providers, and review recent Residential Habilitation claims utilization

Under this option, Mercer would conduct an analysis of SFY 2019/2020 claims data for Residential Habilitation services (by setting and SIS group) and combine the utilization data with submitted surveys, using a higher level residential survey to collect information in aggregate by residential setting, staffing level and SIS group (rather than by residential home). We would use this information to compare the results to those from the 2016 analysis by setting and SIS group.

- This option reflects the recent experience of residential habilitation service delivery – but for more providers in the community than in Option 1.
- The key item to evaluate further with ODP is the time this approach will take given that extra time is needed for survey development, completion and analysis of the updated data. This approach will likely also require more outreach and follow-up with providers.

Please let us know your initial thoughts on the options we have outlined above. We'd like to schedule some time to discuss further and have included some available days/times later this week for a meeting below. Let us know if any of these work for your schedule.

- Thursday, 9/23: 2 – 3pm ET
- Friday, 9/24: Between 2 – 4pm ET

Thank you,  
Holly

### Holly Brown

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**From:** Smith, Rick [REDACTED]  
**Sent:** Friday, September 10, 2021 12:44 PM  
**To:** Brown, Holly M <[holly.brown@mercer.com](mailto:holly.brown@mercer.com)>  
**Cc:** Wahlman, Jason <[jason.wahlman@mercer.com](mailto:jason.wahlman@mercer.com)>; Stenglein, Kelsey <[Kelsey.Stenglein@mercer.com](mailto:Kelsey.Stenglein@mercer.com)>; Song, Yixuan <[yixuan.song@mercer.com](mailto:yixuan.song@mercer.com)>  
**Subject:** RE: [External] 9/9 Meeting Agenda: IDA Rate Refresh Request

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Holly,

I know you guys have a lot on your plate at the moment. Relative to the residential staffing survey, I am wondering how difficult it would be to use the data gathered in 2016 and incorporate current Needs Groups of individuals to see if the hour bounds shift at all? The provider workgroup generally felt that staffing hours at homes hasn't changed much over time, but that Needs Levels/Groups have become more accurate as a result of continuing assessments. We are also going to gather current staffing hours for the homes/providers on the workgroup, but thought this might give us another data point for tweaking the hour bounds. Please let me know your thoughts on how difficult this would be.

Thanks,  
Rick

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**From:** Brown, Holly M <[holly.brown@mercer.com](mailto:holly.brown@mercer.com)>  
**Sent:** Wednesday, September 8, 2021 5:46 PM  
**To:** Smith, Rick [REDACTED]; Mochon, Julie <[jmochon@pa.gov](mailto:jmochon@pa.gov)>; Yale, Jeremy [REDACTED]  
**Cc:** Wahlman, Jason <[jason.wahlman@mercer.com](mailto:jason.wahlman@mercer.com)>; Stenglein, Kelsey <[Kelsey.Stenglein@mercer.com](mailto:Kelsey.Stenglein@mercer.com)>; Song, Yixuan <[yixuan.song@mercer.com](mailto:yixuan.song@mercer.com)>; Brown, Holly M <[holly.brown@mercer.com](mailto:holly.brown@mercer.com)>  
**Subject:** [External] 9/9 Meeting Agenda: IDA Rate Refresh Request

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Good afternoon,

For our call scheduled for 11am ET tomorrow, please see our proposed agenda below.

1. Fee development status update
2. IDA items for confirmation
  - Transportation service fees
  - Statewide versus regional wages/fees
  - Ineligible fees for IDA and AAW
  - Agency with Choice FMS Admin Fee
  - Residential staffing survey
1. Initial ODP feedback related to assumption changes for IDA services (*Note: we will plan to schedule subsequent calls to discuss all of the service-specific details*)

## 2. Next steps

Please let us know if you have any other items to add for tomorrow's discussion.

Thank you,  
Holly

### Holly Brown

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-----Original Appointment-----

**From:** Erickson, Brooke <[brooke.erickson@mercer.com](mailto:brooke.erickson@mercer.com)>

**Sent:** Tuesday, September 07, 2021 11:00 AM

**To:** Erickson, Brooke; [REDACTED]; [REDACTED]; Wahlman, Jason; Stenglein, Kelsey; Brown, Holly M; Song, Yixuan

**Subject:** PA ODP — IDA Rate Refresh Request

**When:** Thursday, September 09, 2021 11:00 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** <https://mmc.zoom.us/j/94738405426?pwd=NWhDa1R1WWFseFVBRE5JVzJ0WFdVdz09>

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