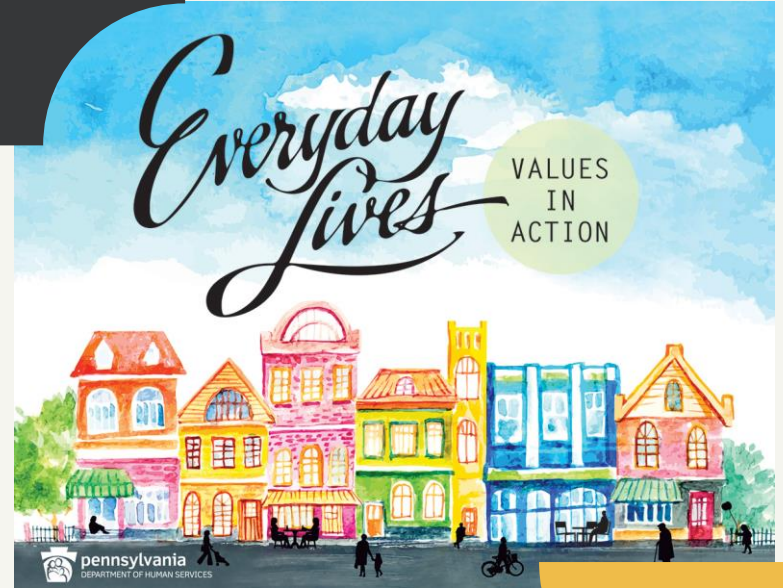




Public Comment: ODP's PROPOSED November 2023 Waiver Amendments

- *Consolidated
- *Community Living &
- *P/FDS Waivers



Agenda:



Overview of Changes – 30 to 40
minutes



Questions – 10 to 20 minutes



Public Comment – 30 to 50 minutes

”

Community Participation Support (CPS)

(sometimes referred to as day
programs)

All ID/A Waivers



pennsylvania
DEPARTMENT OF HUMAN SERVICES

CPS Current Process

Current Process:

- **ISP teams complete a variance for every individual that receives less than 25% of their CPS time in community settings on average.**
- **This requirement has been suspended during COVID-19 through Appendix K**

Issues:

- **Requires a lot of time to complete and has not been found to impact the quality of services in general.**
- **ODP has found that participation in community activities did not decrease as a result of the suspension of this requirement.**

CPS Proposed Changes

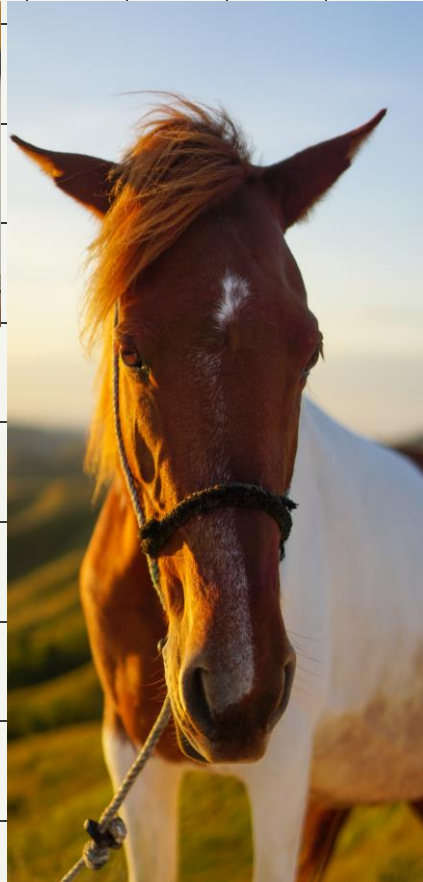
Service locations where more than 10% of individuals are receiving less than 25% of their time in community settings on average are required to include information in a Quality Management Plan.

Language added to allow CPS to assist the individual with obtaining counseling related to employment supports.

- Helping contact Ticket to Work Help Line, obtaining their benefits statement from their local Social Security, etc..**

Music, Art, & Equine Assisted Therapy

All ID/A Waivers





Expanding this service to include group therapy:

*“Therapy services consist of the following individual **and group** therapies for no more than 4 individuals...”*





For all ID/A
Waivers

SHAC Purpose



- **Improve physical health and wellness outcomes for people. SHAC services will provide telehealth assessments to determine the best clinical course of action, often avoiding unnecessary emergency room visits.**
- **When the person needs care outside their home this service coordinates the person's care with the local emergency department, primary care physician, and other healthcare providers.**

What is included in SHAC?

Video assisted
examinations

Development of
treatment plans

Education on the
symptoms and
how to support
the person

Coordination
with other
healthcare
professionals

Follow-up
consultations

Medical support
for DSPs and
nursing staff

Who Can Receive the SHAC Service

Individuals who live in private homes they own, rent, or lease

Individuals who live in private homes owned, rented, or leased by family

Individuals who live in licensed or unlicensed residential homes (including Residential Habilitation and Life Sharing)

SHAC and Technology Needed:

The individual must have an electronic tablet or smart phone that has internet service via Wi-Fi or cellular data

The individual's technology must have audio & video abilities.

SHAC does not replace in-person exams that are needed or required by licensing.

Examples (SHAC):

1. On a Saturday, there is a DSP who is working at a group home (providing Residential Habilitation service) and an individual has developed a fever. Instead of the DSP making the decision themselves on what to do, they can use SHAC to obtain medical advice about next steps.



2. The individual is with their mom (unpaid caregiver in this example) and the individual won't stop vomiting. Mom can call a doctor through SHAC to get advice on next steps.

SHAC: Provider Qualifications

Provided by or overseen by
physicians who are:

- ❖ Licensed to practice medicine in PA
- ❖ Board Certified or eligible

Can also be provided by Registered Nurse (RN), Certified RN Practitioner, or Physician's Assistant when overseen by a physician

All staff providing the service must have completed training/curriculum on how to provide health care to individuals with ID/DD/A



Residential Services

Technology Used for Residential Remote Supports

Proposed Process: Allow people receiving residential services to also receive the Technology/Equipment component of Remote Supports (procedure code W6087).

Current Process: Covered under Assistive Technology service
Issues:

- Different processes for individuals in private homes and individuals in residential homes
- Challenging to determine who is receiving remote supports as a method of residential service delivery

Residential Habilitation, Life Sharing, & Supported Living: *Provider Qualifications*

Consolidated & Community Living Waivers

1

Actively provided direct non-residential services as an ODP enrolled provider for the **2 *years prior*** to enrolling to provide a residential service and be in good standing with the Department

2

Annually submit to ODP the most recent financial statement that has been audited by an independent Certified Public Accountant.



Life Sharing Provider Qualifications for Agencies serving individuals with a medically complex condition (MCC)

Consolidated Waiver

Expanded language on the risk mitigation policy

Have a risk mitigation policy that identifies:

- Possible risks
- What the provider will do to mitigate those risks.

Risks could include medical equipment or technology dependent equipment malfunctions, late delivery of medical supplies or medications, and absence or late arrival of medical staff

MCC Life Sharing Provider Qualifications Continued

Life Sharer who is **NOT RELATED** to the individual must have 1 of the following:

- A high school diploma, **GED**, or equivalent **or**
- Documentation of at least one post-secondary course that was completed post high school graduation.

Life Sharer who **is RELATED** to the individual must have 1 of the following:

- A high school diploma, GED, or equivalent.
- Documentation of at least one post-secondary course that was completed post high school graduation
- A written attestation from the Life Sharing agency



Supported Employment

All ID/A Waivers

Supported Employment

1

Language added to clarify all parts of Supported Employment may assist the individual with contacting agencies and obtaining documents relating to employment.

2

Job Coaching & Support:
Fading
plan/schedule within 6 months of the first day of service delivery



Remote Supports – Provider Qualifications

All ID/A Waivers

Remote Supports – Provider Qualifications

To provide Remote Supports services, the agency must...

~~2. Have a waiver service location in Pennsylvania or a state contiguous to Pennsylvania. (The physical location of a company that sells a good may be located anywhere in the United States or the American territories.)~~

3. Have a secure, central facility in the **United States** where staff render Remote Supports that has appropriate and stable connections...

4. Have staff available to provide in-person training as needed or requested as described in the Remote Supports Implementation Plan.

”

Other Proposed Waiver Changes



P/FDS Cap Exception

Individuals can have more than \$41,000 in waiver services specifically for **CPS and Transportation Trip** services when:

- The individual was enrolled in the P/FDS Waiver prior to July 1, 2023; and
- The individual will maintain the number of units for these services that were authorized in January 2020 or the Fiscal Year 22-23 ISP, whichever is greater

Supports Coordination Monitoring Through Teleservices

Community Living & Consolidated Waivers

For residential services – Supports Coordination teleservices may not be used to conduct monitoring in the residential home and no more than six months can lapse between face-to-face monitorings at the residential setting.

Stakeholder Questions with ODP's Answers

Today's Public Comment Process



We will now go over answers to some of the questions we have received regarding these waiver amendments.

The remaining time is reserved for obtaining public input on the waiver amendments - **5 minute limit on comments**



Public Comment

Written Public Comments

You have 3 options to submit written comments:

1. Write them in the question pane during the webinar
2. Email comments to RAodpcomment@pa.gov.
3. Mail comments to Julie Mochon, Department of Human Services, Office of Developmental Programs, 625 Forster Street, Room 510, Harrisburg, PA 17120



Public comments end on June 27, 2023 at 11:59PM. These comments will be reviewed and considered for revisions to the proposed waiver amendments.

Resource

To find the proposed waiver changes & information about public comment: [2023 Proposed Waiver Amendments \(pa.gov\)](#)