

# Final Fee Schedule Rates and Fiscal Year Renewal Guidance for Community Participation Support

## ODP Announcement 19-061

### AUDIENCE:

Individuals and Families, Providers of Community Participation Support services,  
Administrative Entities, Supports Coordination Organizations, Other Interested Parties

### PURPOSE:

The purpose of this communication is to announce that the final Fee Schedule Rates for Community Participation Support services in the Consolidated, Community Living, and Person/Family Directed Support (P/FDS) waivers have been published in the Pennsylvania Bulletin. This communication also provides guidance for completing Fiscal Year Renewals for fiscal year 2019-20 related to the change in procedure codes and rates for Community Participation Support services.

### DISCUSSION:

A public notice will be published in the Pennsylvania Bulletin Volume 49, Number 21 on Saturday, May 25, 2019. The notice informs stakeholders of the final Fee Schedule Rates for Community Participation Support services. The title of the notice is “Fee Schedule Rates for Community Participation Support Services Funded Through the Consolidated, Community Living and Person/Family Directed Support Waivers and the Community Intellectual Disability Base-Funded Program”. You may obtain the public notice by following this link: <https://www.pabulletin.com/secure/data/vol49/49-21/793.html>

The Department announced the proposed Fee Schedule Rates for Community Participation Support services in [ODP Announcement 19-024](#) on March 6, 2019. The Department received comments from more than 3,000 people and organizations regarding the proposed changes to the Fee Schedule Rates for Community Participation Support services. As a result of the comments received, the Department adjusted the

assumptions regarding the use of full-time versus part-time staff, the cost for training and the staff wage ranges which were used to establish the Fee Schedule Rates for Community Participation Support services. As a result of these adjustments, the Department has increased the Fee Schedule Rates for Community Participation Support facility that were included in ODP Announcement 19-024 for procedure codes W7222, W7223, and W7226. The rate assumption logs containing the revised assumptions are available at the following address:

<http://www.dhs.pa.gov/provider/developmentalprograms/waiveramendment/index.htm>. The Department has reduced the number of Community Participation Support procedure codes from 54 to 15; creating efficiencies when stakeholders are planning, authorizing, and billing for the service.

The final Fee Schedule Rates for Community Participation Support are available below as the formatting of the rate tables in the Pennsylvania Bulletin can be difficult to read.

**Community Participation Support (CPS) Fee Schedule Rates Effective July 1, 2019**

<b>Service Name</b>	<b>Unit of Service</b>	<b>Procedure Code</b>	<b>Statewide Fee</b>	<b>Enhanced Communication Statewide Fee (U1 modifier)</b>
CPS Community 1:2 or 1:3	15 minutes	W9351	\$5.36	\$6.15
CPS Community 2:3	15 minutes	W9352	\$8.01	\$9.35
CPS Community 1:1	15 minutes	W5996	\$9.84	\$11.52
CPS Community 1:1 Enhanced	15 minutes	W5997	\$13.68	\$16.40
CPS Community 2:1	15 minutes	W5993	\$18.94	\$22.30
CPS Community 2:1 Enhanced	15 minutes	W5994	\$22.78	\$27.18
CPS Facility 1:11 to 1:15	15 minutes	W7222	\$2.27	\$2.51
CPS Facility 1:7 to 1:10	15 minutes	W7223	\$2.44	\$2.77
CPS Facility 1:4 to 1:6	15 minutes	W7226	\$4.01	\$4.61
CPS Facility 1:2 to 1:3	15 minutes	W7224	\$5.26	\$6.06
CPS Facility 1:1	15 minutes	W7244	\$9.52	\$11.12
CPS Facility 1:1 Enhanced	15 minutes	W9353	\$13.25	\$15.85
CPS Facility 2:1	15 minutes	W7269	\$18.26	\$21.45
CPS Facility 2:1 Enhanced	15 minutes	W9356	\$21.98	\$26.17

## **Rate Load**

All rates are anticipated to be visible in HCSIS on May 28, 2019. On the same date, contracts will be created for all new services if the provider is qualified for the specialty associated with the service and FY 2019-20 contracted rates will be visible in provider service offerings. On May 28, 2019 and forward, contracts will continue to be created weekly as service offerings are manually created by providers.

## **Requirements for Individual Support Plan Team Meetings for FY2019-20 Renewals**

The purpose of the changes to the Fee Schedule Rates for Community Participation Support services is to simplify procedure codes and change the staff to individual ratios to make planning, authorizing and billing more efficient and to reflect service delivery more accurately. The changes also align with the *Everyday Lives* recommendations and Centers for Medicare and Medicaid Services (CMS) requirements to increase opportunities for people to participate in integrated community activities.

Beginning in Fiscal Year 2019-20, procedure codes for Community Participation Support will be grouped by either a *community* location or a *facility* location. To determine the number of units for each, the Individual Support Plan team must discuss approximately how many units of time each person will spend in community locations and facility locations. This discussion should be person-centered, considering each individual's preferences, choices and interests. Some circumstances to consider when determining the number of community and facility units to include in an Individual Support Plan are:

- Fluctuations in the individual's schedule due to spending more time in community locations seasonally or based on activity.
  - Example: An individual who typically is supported in the community for 40 units per week got a part in a play put on by a community theater group and will require support in the community for 60 units per week 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.

Use <u>Facility</u> Procedure Codes When:	Use <u>Community</u> Procedure Codes When:
Participant receives services in a licensed adult training facility (55 Pa. Code Chapter 2380)	Participant receives services in an integrated community location where 3 or fewer people are receiving Community Participation Support services
Participant receives services in a licensed vocational facility (55 Pa. Code Chapter 2390)	
Participant receives services in a community location where more than 3 people are receiving Community Participation Support services.	

Due to the simplification of the billing structure for Community Participation Support services, it will no longer be required for providers, Individual Support Plan teams and Administrative Entities to anticipate and track the percentage of time each individual will receive services in the community or facility on average per week for the purposes of inserting procedure codes in the Individual Support Plan and billing. This was only required when procedure codes were connected to specific percentages of time each individual spent in the community each week. Starting July 1, 2019, providers and Individual Support Plan teams will only need to anticipate and track the monthly average amount of time each individual participates in integrated community activities to:

- Ensure that Community Participation Support services are not provided in a licensed adult training facility or vocational facility for more than 75% of the individual’s support time, on average per month.
- Determine if a variance needs to be completed as stipulated in the Community Participation Support service definition.

Supports Coordinators should begin adding the procedure codes listed in this communication to Individual Support Plans effective for Fiscal Year 2019-2020. See ODP ODP Announcement 19-051, Appendix B, for a list of all Community Participation Support service iterations available in HCSIS. In addition, a sample tracker has been developed and included as Attachment 1 to assist providers and Supports Coordinators

determine how many units are needed for each staffing ratio in facility and community locations.

Due to the number of Individual Support Plans that will need to be updated, ODP is *not* requiring Supports Coordinators to hold a team meeting before changing the Individual Support Plans to reflect the new Community Participation Support procedure codes *unless* one of the following situations occur:

- The transition of current units the individual receives services in the facility or community would result in the individual being over the \$33,000 Person/Family Directed Support (P/FDS) annual limit on services.
- There is a need to increase or decrease staffing ratios.
- There is a need to increase or decrease the overall number of units, frequency or duration of Community Participation Support services.

When team meetings are required for fiscal year 2019-20 renewals due to changes discussed in this communication, it is acceptable to hold them via a conference call if the team is agreeable to this format.

#### **Using Multiple Procedure Codes**

When making any changes to the Community Participation Support procedure codes starting July 1, 2019, Individual Support Plan teams should consider including more than one procedure code in the Individual Support Plan. 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 one time each week for which the individual will need 1:1.

***To minimize the number of critical revisions necessary to Individual Support Plans, Supports Coordinators 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.***

### **P/FDS Cap Exceptions**

A P/FDS cap exception may be approved to preserve the Community Participation Support and Transportation Trip services currently authorized in the Individual Support Plan. A P/FDS cap exception may not be approved to:

- Increase the overall number of units, frequency or duration of Community Participation Support services.
- Change the number of units the individual currently receives Community Participation Support services in community or facility settings.
- Increase the staffing ratios for Community Participation Support services.
- Increase the number of miles traveled as part of the Transportation Trip service.

P/FDS cap exceptions should be identified by the Individual Support Plan team and a request should be submitted to the Administrative Entity no later than June 30, 2019. The Administrative Entity will submit exception requests to their ODP designated Regional Office for review **no later than July 14, 2019**. ODP approvals will be communicated to the Administrative Entity.

Please review the following additional ODP Communications containing important information about fiscal year renewals:

- [ODP Announcement 19-051](#)
- [ODP Announcement 19-030](#)

### **Changes to Transportation Trip and Delay in On-call and Remote Support**

Pending approval from the Centers for Medicare and Medicaid Services (CMS), the Department will also be adding an on-call and remote support component to the Community Participation Support service, which will enable waiver participants to have more independence while participating in community activities because provider staff will be available if an issue arises that impacts the waiver participant's health and safety. Since amendments to the Consolidated, Community Living and P/FDS waivers must be approved by the CMS before the Department can implement an on-call and remote support component to the Community Participation Support services, the procedure code and Fee Schedule Rate for this component of the Community Participation Support services will not be effective until October 1, 2019. Individual Support Plan teams

cannot add the on-call and remote support component to the Individual Support Plan until notified via an ODP communication.

ODP Announcement 19-024 also proposed adding Transportation Trip as a service that could be self-directed through one of the participant-directed services models. The Department received more than 30 comments about this proposed change. Due to concerns expressed, the Department will not pursue the implementation of Transportation Trip in the participant-directed services models. Please disregard Transportation Trip as a self-directed service that is currently present in HCSIS. It should be removed within the next two weeks.

A summary of the comments received and the Department's responses is available at <http://www.dhs.pa.gov/provider/developmentalprograms/waiveramendment/index.htm>.

**CONTACT:** Questions about this communication should be directed to the appropriate regional Community Participation Support lead as listed below:

Central Region: Kathy Shreffler, [kshreffler@pa.gov](mailto:kshreffler@pa.gov); Kathy Zumbrun, [kazumbrun@pa.gov](mailto:kazumbrun@pa.gov)

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*See also Attachment 1: CPS Procedure Code Tracker Excel Document*