

Fiscal Year (FY) 2022-2023 Individual Support Plan (ISP)

Renewal Guidance

ODP Announcement 22-050

AUDIENCE:

This Administrative Entities (AEs)
Supports Coordination Organizations (SCOs)
Supports Coordinators (SCs)
All Providers of Consolidated, Community Living or Person/Family Directed Support
Waivers or Base-Funded Services
Other Interested Parties

This Communication does not apply to Adult Autism Waiver (AAW) Providers

PURPOSE:

This communication will provide guidance for the FY 2022-2023 renewal period.
The following topical areas will be addressed in this communication:

- General Guidance related to the COVID-19 Pandemic
- Person/Family Directed Support (P/FDS) Cap Exceptions
- Guidance For Updating FY 2022-2023 Renewal Plans with Partial Year Service Segments
- Waiver Rate Load
- Variance Process for Established Service Requirements
- Consolidated Waiver Fee Schedule Residential Rate Exceptions
- New ARPA Base Funding Stream
- Reserve to Encumbrance
- Resources

DISCUSSION:

This communication is intended to provide guidance to all stakeholders who participate in the FY 2022-2023 renewal ISP process.

General Guidance related to COvid-19

To ensure adequate planning to meet the anticipated needs of individuals during FY 2022-2023, all stakeholders involved in the planning process should assume, at a minimum, that an individual's current level of service and support needs are reflected in their FY 2022-2023 renewal ISP until ODP issues subsequent guidance. If service units were reduced in FY 2021-2022 due to underutilization, ISP Teams should determine whether those units should be restored in FY2022-2023 due to:

- A change in conditions (the individual's preferred CPS service location has reopened, it is anticipated that CPS closures will be less frequent due to COVID-19 vaccinations, the service provider is resuming the option for face-to-face service delivery, etc.); and/or
- The individual's needs have changed (the individual would like to resume face-to-face services or would like to reengage in community activities, etc.)

As needs changed in FY 2021-2022 due to alterations in COVID-19 restrictions or adjustments have occurred in service provision because of the COVID-19 pandemic, discussions should have been held by ISP teams to revise plans. If a current plan needs revision for these reasons but a team meeting has not been held to do so, it should be held as soon as possible. In the event that a team meeting is not possible by June 30, 2022, a FY plan can be created, and a team meeting held by September 30, 2022, so appropriate/needed revisions can be made. Meetings may need to occur that are outside of the normal annual meeting. Team meetings may be rendered remotely, including by telephone, when remote support meets the health and safety needs of the individual receiving services.

Guidance to Address Shifts in Services Due to COVID-19 Pandemic

ODP recognizes that the COVID-19 pandemic has caused community-based service delivery to shift to alternative approaches and supports, such as using a remote option for the provision of services.

ISP teams should reference ODP's Individual Transition Guide and probe guidance in the annotated ISP to assess risk related to the COVID-19 pandemic. These discussions will determine what services and supports are needed to enable the individual to safely resume activities or engage in new activities. All conditions outlined in ODPANN 22-010 – Operational Guide Version 3 (Updated 02/04/22) continue to apply.

Community Participation Supports (CPS), Transportation and Residential Habilitation Services

CPS, Transportation and Residential Habilitation providers are encouraged to collaborate with and respond to feedback requests made by SCOs and AEs related to individual attendance, expectations for transportation services and Residential Habilitation with and without day services.

Person/Family Directed Support Waiver (P/FDS) Cap Exceptions

Individuals who have an approved P/FDS cap exception in FY 2021-2022 due to the COVID-19 pandemic will continue to have the same cap exception in FY 2022-2023 if their FY 2021-2022 authorized ISP exceeded \$33,000. For new cap exception requests that exceed the \$41,000 P/FDS cap that became effective January 1, 2022, including those resulting from rate annualization, please follow the guidance posted on the Pennsylvania Department of Human Service (DHS) webpage. This guidance can be found by using the following hyperlink: [ODP-Waiver Cap Exceptions \(pa.gov\)](#). The existing template should be used for any new cap exceptions requests.

Due to the auto authorization functionality within HCSIS, SCs should mark ISPs for *manual review* for FY 2022-2023 ISPs approved for an individual cap exception. AEs will conduct manual reviews of ISPs to ensure that the approved cap is not exceeded. AEs will need to manually approve and authorize the ISPs with approved cap exceptions to ensure the content and services are aligned with the COVID-19 ODPANN 22-010 – Operational Guide Version 3 (Updated 02/04/22). AEs should identify and report to their designated ODP Regional Waiver Capacity Managers any individual for whom an individual exception is no longer needed.

It is ODP's expectation that ongoing planning efforts to transition individuals to the Community Living Waiver (CLW) continue for individuals who are approved for a P/FDS cap exception prior to the COVID-19 pandemic. After the FY 2022-2023 renewal period, ODP intends to request updates from applicable parties on transition efforts. A future ODP communication will outline AE reporting requirements to support ODP assessment of transition efforts.

Cap exception questions should be directed to your ODP Regional Waiver Capacity Manager.

Guidance For Updating FY 2022-2023 Renewal Plans With Partial Year Service Segments

When a FY Renewal is created in HCSIS, all services with an end date of 06/30/2022 for the 2021-2022 fiscal year are copied over to the 2022-2023 FY Renewal plan. This means that, when two date unit/segments exist, only the second date/unit segment pre-populates into the draft FY renewal, which is the case with the 2022-2023 FY renewals. The majority of service units in the 2022-2023 draft FY renewal will need to be modified by the SCO to reflect the level of support the ISP Team agrees will meet the assessed needs of the individual for fiscal year 2022-2023 before submitting for approval. When the service units on the current plan reflects the anticipated needs of the individuals, the total unit amount for both service segments may be used as the total unit amount for FY 2022-2023 renewals. For participant directed services, the SCO should ensure the Total Amount accurately reflects any adjustments to Total Annual Units that are made for FY 2022-2023.

See the resource [ODP-ID/A: SC100I Supports Coordination](#) > Chapter 17: Fiscal Year Renewal: ISP - v8.0 9/21/13 in the LMS for information on how to perform a FY Renewal and directions on how to remove services (page 10) from a fiscal year renewal ISP.

Because the majority of fee schedule rates were increased during FY 2021-2022, when the FY 2022-2023 Renewal is adjusted to be annualized, it is possible that either the \$41,000 P/FDS cap or \$85,000 Community Living Waiver cap could be exceeded, when the FY 2022-2023 Renewal is adjusted to be annualized. AEs who have access to the Enterprise Data Warehouse (EDW) should review the ODP AE Performance Dashboard for a list of waiver participants with current FY 2021-2022 authorizations near the waiver cap. AEs are strongly encouraged to share this information with SCOs. To access the AE Performance Dashboard, click on the following link:

<https://www.dhsanalytics.dhs.state.pa.us/analytics> > Sign in through User ID and password (must have Cognos Cube and Report License) > Team Content > HCSIS > Near Real Time Reports > ODP AE Reports > ODP AE Performance Dashboard > Run through HTML

FY 2022-2023 waiver rate load in hcsis, contracts and Services and supports Directory (SSD)

Fiscal Year 2022-2023 rates were loaded to HCSIS on April 6, 2022, and the HCSIS FY 2022-2023 contract creation batch job began creating FY 2022-2023 contracts on Friday night, April 8, 2022. The majority of FY renewals created after April 8, 2022, will show as real contracts with services authorized. If a FY renewal was created before the contract creation batch job ran on April 8, 2022, service contracts on the FY renewal will be in a provisional on hold (POH) status until the POH to real batch job is run on April 22, 2022. Services on these FY Renewals may need to be Pre-Authorized, after the contract status is updated to real.

If a rate fails to load into the FY 2022-2023 Renewal plan, please contact ra-ratesetting@pa.gov mailbox.

When a *new* service offering is added to a provider's service location, a contract is created for FY 2022-2023 by the overnight "Contract Creation" batch job. If a service contract was created before the "Contract Creation" batch job's start date of April 8, 2022, the contract may contain the FY 2021-2022 rate and be in provisional status.

These contacts will be updated with the FY 2022-2023 rate once the overnight “provisional to real” job is run automatically. The “Provisional on Hold” batch job is anticipated to begin running overnight on April 22, 2022 and will continue running until all provisional on hold contracts are converted to real. This batch job runs daily overnight and converts provisional contracts to real contracts if a FY 2022-2023 rate exists in PROMISe™. If the provisional contracts were converted to real, then users will see the FY 2022-2023 rate reflected in the SSD and the FY renewal plan will reflect the FY 2022-2023 rate for services pre-authorized on the plan. If the provisional contracts were not converted to real, then users will see the reason for the exception in the “Provisional On-Hold to Real Contract Conversion Exception Report” which will be automatically added to the user’s Reports Inbox.

If a FY 2022-2023 service is missing in the SSD but existed in the SSD for FY 2021-2022, then a contract was **not** created. This could happen for the following reasons:

1. Mass rate change corrections could be pending because the P/FDS or Community Living waiver cap was exceeded and the plan needs to be adjusted but was not completed yet by the AE or,
2. If the FY 2022-2023 renewal is created while a FY 2021-2022 plan is in draft status (contact AE) or,
3. The qualified provider chose not to offer the service in FY 2022-2023 for a particular county or the provider is not qualified to render the service in the upcoming fiscal year or,
4. When the FY 2022-2023 rate does not exist in PROMISe™ or a contract needs to be manually created, then a contract will not be created. This can be reviewed by requesting the Contract Creation Exception Report. For this specific scenario, e-mail the rate setting mailbox: ra-ratesetting@pa.gov.

If none of the scenarios above are true for your situation, contact the HCSIS helpdesk (1-866-444-1264, c-hhcsishd@pa.gov) request a TFS ticket is opened, explain your issue, provide them with a Master Client Identifier (MCI) number, provider Master Provider Identifier (MPI) number, service location code and procedure code to enable them to perform a root cause analysis.

Needs Level/Needs Group Clean-up

SCOs and AEs are strongly encouraged to review the individual's needs level/needs group (NL/NG) and assess if the services on the individual's FY 2021/2022 ISP have the correct NL/NG before creating a FY Renewal. If the plans are not corrected before the FY renewal is created, the incorrect service(s) will be copied over to the new FY plans. Both the current Approved plan and the FY Renewal should reflect the correct service.

The Needs-Based Services Misalignment Report is available in HCSIS. This report provides users with details about an individual's demographics, NL/NG information, and service details for authorized and pre-authorized needs-based services. The services listed on this report currently exist on FY 21/22 Approved plans and do not align with the individual's most current Needs Group. To run the Needs-Based Services Misalignment Report, navigate to HCSIS > Tools > Reports > Detail Report(s) > Needs-Based Services Misalignment Report. Available report formats are Excel and .CSV

Users may also view the *Needs Level/Needs Group Tip Sheet* to learn more about the NL/NG and available reports. The tip sheet is found in the HCSIS LMS by navigating as follows: LMS > ODP-ID/A: FM100I County Financial Management > Needs Level Needs Group (Stakeholders) _3-22-2022

Variance Process for Established Service Requirements

For services subject to the Variance Process, AEs should only authorize services on the 2022-2023 FY Renewal through the currently approved end date.

Service, service units and service date segments on the FY 2022-2023 renewal ISPs should accurately reflect approved units and approved variance timeframes based on the annual date. The approved Needs Exception Allowance rates will be reviewed based on new rates and rate assumptions. Providers will be notified of their revised rates, which will be effective July 1, 2022.

Consolidated Waiver Fee Schedule Residential Rate Exception

ODP will carry forward all approved Needs Exception Allowances from FY 2021-2022 to FY 2022-2023. ODP is reviewing and updating all existing Needs Exception Allowance rates using the rate setting methodology and assumptions that resulted in the rates effective January 1, 2022. Updated rate letters are expected to be issued by June 1, 2022; therefore, it is recommended that plans for individuals with exceptional residential rates be updated at that time.

ARPA Base Funding Stream

To assist the counties with managing ARPA funds used to fund services and supports for individuals, the “ARPA” funding stream will be available in HCSIS and associated with all ODP available services once the county allocation amounts are loaded to HCSIS. The anticipated date for this to occur is May 27, 2022¹. Please continue to follow ODP Communication 22-109, UPDATE: COVID-19 American Rescue Plan Act (ARPA) Funding for Respite and Family Driven Support Services (FDSS), issued on April 6, 2022, for quarterly ARPA reporting requirements.

¹ The county allocation dollar amounts maybe entered prior to this date. If so, a listserv communication will be issued to alert AEs.

When to Create FY 2022-2023 ISPS

ODP recommends the following schedule for your fiscal year activities based on timeframe of activities occurring. In consultation with the applicable AE, the SCO may make a determination to organize their workload based on preference.

SERVICE COMPOSITION	DEPENDENCIES	WHEN TO
SC Services Only		Now
Base services		Now
ARPA Funded Services (Base)	Funding Stream anticipated to be visible May 27, 2022 ² .	May 27, 2022
Base services funded with Base dollars <u>but use waiver rates</u>	This activity is dependent on the FY 2022-2023 rate load which occurred on 4/6/22	Now
P/FDS, Consolidated and Community Living Waivers	This activity is dependent on the FY 2022-2023 rate load which occurred on 4/6/22	Now
Note: The ISP Readiness Report will begin running on 4/28/22.		

R2E: Reserve to Encumbrance

² The county allocation dollar amounts maybe entered prior to this date. If so, a listserv communication will be issued to alert AEs.

AE/County Action

Please note that the following actions are contingent upon ODP entry of the projected allocation which is anticipated to occur on May 27, 2022.

A. Preparation tasks before running the year end R2E process³

1. Run the Provider Service Status Report (contract types) for FY 2022-2023 and Provisional On-Hold Contracts: ***Tools --> Reports --> Reports Request***
2. Run the Provider Service Status Report for FY 2022-2023, Real Contracts: ***Tools --> Reports --> Reports Request***
3. Run the Projected Plan Budget Amount Exceeded Report for FY 2022-2023: ***Tools --> Reports --> Reports Request***
4. Review the base allocation amount by accessing the **Funding Level** screen. To make changes, navigate to the **Non-Service Encumbrance, Overbooking and Revenue Adjustment** screens.
5. Run the County Funding Level Report for the upcoming FY and all Funding Streams: ***Tools --> Reports --> Reports Request***
6. Run R2E after:
 - ODP communicates the R2E batch has been released
 - There are no incorrect rates for real contracts in the upcoming FY
 - Providers have service authorizations and can begin providing services

B. Enter the Projected Plan Budget (PPB) for base ISPs

1. Use the last year's (FY 2021-2022) PPB amounts to populate the PPB amounts for FY 2022-2023. This task can be accomplished by doing one of the following:

³ Resource located in HCSIS > LMS > FM Guidebook and Supporting Materials > "Year End R2E Process Checklist v2.0 06/17/10"

- a. The county user can use the **View / Update Budget Amount By Individual** option from the ***Budget Management Menu*** screen to enter the PPB amount for one individual at a time - or -
 - b. The county user can use the **Populate Future Fiscal Year Projected Plan Budget Amounts** option to auto-populate future fiscal year (target fiscal year) PPB amounts for all the individuals within their scope using existing data from the previous fiscal year (source fiscal year).
2. If the user entered the PPB amounts by copying over the prior year's funding ***before ODP entered the FY 2022-2023 funding streams***, the FY 2022-2023 funding stream(s) would have been selected. Once the AE runs the Reserves to Encumbrance (R2E), the funding stream(s) will automatically be replaced by the corresponding funding stream applicable for FY 2022-2023. The request to copy over the PPB amounts is processed overnight. The next day, the **Populate Future Fiscal Year Projected Plan Budget Amounts Report** is made available on the ***Reports Inbox*** screen.
 3. If manually entering the PPB amounts ***after ODP entered the FY 2022-2023 funding streams***, select the "HUMAN SERVICE DEVELOPMENT FUND - Waiver Ineligible" funding stream.

NOTE: R2E process may be run many times, however it must be run at least once AFTER 6/30 and BEFORE providers submit claims

Resources

For information related to special considerations, please contact the ODP Regional Program Office assigned to your region.

For questions related to the participant-directed services (PDS rate table or calculator), please contact your ODP Regional Financial Management Services (FMS)/PDS Lead.

See the resource [ODP-ID/A: SC100I Supports Coordination](#) > *Chapter 17: Fiscal Year Renewal: ISP - v8.0 9/21/13* in the LMS for information on how to perform a FY Renewal and directions on how to remove services (page 10) from a fiscal year renewal ISP.