

Performance-Based Contracting (PBC) Updates

June 17, 2025



Residential PBC

Status Update: Tier Determinations



- 404 Feb-Mar submissions for tier determination
 - Primary: 345
 - Select: 33
 - Clinically Enhanced: 26
- Outcomes for 2024-2025 combined submission periods
 - Primary: 410
 - Select: 16
 - Clinically Enhanced: 7
- 17.2% of individuals are served by advanced tiers
- PBC Residential Provider Directory

Status Update: Pay-for-Performance (P4P)



- Capacity building investments
 - DSP credentialling (\$25M available)
 - Technology (\$3.75M available)
 - Employment (\$7.5M available)
- 224 providers submitted for at least one of the following
 - Credentialing: 221
 - Technology: 136
 - CIE: 166
- Qualifying P4P submissions
 - Credentialing: 152
 - Technology: 124
 - CIE: 126

PBC & Areas of Improvement



- Increased number of providers offering lifesharing and supported living. From July 2023 to January 2025 number of enrolled providers increased:
 - Lifesharing 81 to 90
 - Supported Living 115 to 135
- Increased employment CY23-24
 - 1% increases for NG1 NG2
- Major improvement in health risk screenings CY23-24
 - 80% reduction in individuals without screening
 - 79% reduction in missed screenings for people at high risk
- Improvement in incident reporting fidelity
 - 50% reduction in potentially unreported incidents of abuse/neglect
 - Improvements in some timeliness measures
- Improvements in risk prevention in residential habilitation settings
 - Reduction in number (decrease of 160) and percentage of violations considered high risk .2% reduction CY2023 to 2024
 - 29% reduction in citations for abuse/neglect

Top Unmet Measures – 2025 Submissions



Measure	Tier	Measure Description	Number Unmet	Number of Providers Scored	
RM-HRS.01.1	All	Current health risk screenings (HRS) in place for all individuals including applicable assessments as indicated by HRST protocol (Both parts of this measure must be 75% or higher)	189	345	54.8%
EMP.01.2	All	Plan for improvement of CIE (action items, responsible person(s), goal dates, communication plan with SC, etc.)	127	345	36.8%
QI.03.1	All	Submission of policies, procedures, and activities supporting family engagement (including provider's approach to identifying persons designated by the individual)	126	345	36.5%
ADM.01.1-A	All	Submission of current financial statements (Profit/Loss and Balance Sheets from within the last 18 months	122	345	35.4%
CN-DD/Bx.03.1-C	All	Provide description of agency capabilities for de-escalation and how provider anticipates and responds to a crisis for individuals. Include: Procedure for debriefing with staff and individuals after engagement in physical restraint	121	345	35.1%
CN-DD/Bx.03.1-B	All	Provide description of agency capabilities for de-escalation and how provider anticipates and responds to a crisis for individuals. Include: Curriculum-based crisis response training used by the agency	111	345	32.2%
RM-IM.01.3	SC	Timely finalization of incidents is demonstrated by at least 86% of incidents finalized within 30 days of discovery	35	59	59.3%
CN-DD/Bx.03.2	SC	Documentation of specialized trauma-informed training/activities for individuals and staff.	31	59	52.5%
RM-IM.01.2	SC	Provider demonstrates reporting fidelity: Maximum number of incidents not reported timely may not exceed 10% of overall reported incidents by provider.	29	59	49.2%
CN-C.01.4	С	Meet a 1:15 minimum ratio of full-time equivalent behavioral/mental health clinical staff to all individuals receiving residential services from the agency	15	26	57.7%

Submission Strengths (examples)



Disclosure and Governance Documentation

Observation: Most providers accurately disclosed key governance and licensing information, including conflict of interest policies, criminal history, licensing status, and financial transparency.

Relevance: This indicates strong internal compliance structures and attention to organizational integrity, which are foundational to trustworthy service delivery.

Behavioral Health Oversight for Restrictive Procedures

Observation: Providers consistently documented that individuals subject to restrictive procedures were evaluated or treated by qualified professionals within the past year.

Relevance: This reflects a strong commitment to clinical oversight and ethical practice in behavior support planning.

Submissions – Areas for Improvement (examples)



Crisis Response and Debriefing

Observation: Submissions often did not include descriptions of crisis de-escalation training or procedures for debriefing after restraints.

Relevance: Debriefing is a best practice that helps both individuals and staff process incidents and reduce future risks. It's also an expected part of trauma-informed care.

Family and Designated Person Engagement

Observation: Several responses did not include a process for identifying individuals designated by the person or for engaging those people meaningfully.

Relevance: Family engagement is most effective when it's individualized. Templates or general statements often miss the mark on person-centered practice.

Supporting Provider and System Quality Improvement (QI)





- PBC goal = improve individual and systems outcomes
- Plan-Do-Check-Act (PDCA) at ODP <u>AND</u> Provider/SCO levels
- PBC performance measure theme = Provider/SCO development/improvement in QI process
- Collecting, analyzing, and using data to drive QI
- ODP is in "Checking" step to:
 - Identify opportunities to support system level improvements
 - Establish system baselines
 - Set system benchmarks
- Continuous Quality Improvement (CQI)



Stay tuned for trainings and resources...



Supports Coordination PBC

Supports Coordination Public Comment



On April 19, 2025, the Office of Developmental Programs (ODP) released the following for public comment:

- Supports Coordination PBC Implementation Plan
- 1915(b)(4) Waiver Amendment for Supports Coordination Services
- 1915(c) Waiver Amendments for P/FDS, Community Living and Consolidated Waivers
- Proposed Supports Coordination Rates

SC PBC Next Steps



- Finalize review of public comments
- Submission of 1915(b)(4) and (c) amendments to Centers for Medicare and Medicaid Services (CMS) in late July
- Finalize pay-for-performance
- Implementation guide
- Preparatory toolkit
- SCO Forums begin in July

Performance Analysis Services (PAS) Vendor



- Contract effective April 1, 2025
- Deloitte selected as PAS vendor via a competitive procurement process
- PAS vendor will complete the following for PBC and Pay for Performance:
 - data collection, aggregation, and analysis
 - dashboard creation
 - reporting
 - maintain an information system to support administration of the 1915(b)(4) waiver for residential and supports coordination services for the Consolidated, Community Living and Person/Family Directed Support (P/FDS) waivers and State Plan TCM.
- ODP will use data to determine tier assignments
- PAS will support reporting to the Provider Performance Review Subcommittee of the Information Sharing and Information Committee (ISAC)