

ODP Webinar on Community Participation Supports (CPS)

Consolidated, Community Living and P/FDS Waiver Amendment Changes

December 2023

ODP submitted The Consolidated, Community Living, P/FDS, and Adult Autism Waivers to CMS on July 25, 2023; they were approved by CMS on October 18, 2023.

The waiver amendments were effective November 1, 2023. This webinar will cover changes specific to the Community Participation Support service and ODP's expectations for CPS Providers and Supports Coordinators in particular.



Now Available: Amendments to the Office of Developmental Programs' (ODP) Waivers Approved by the Centers for Medicare and Medicaid Services (CMS)
ODP Announcement 23-085

AUDIENCE:

- Individuals and Families
- Providers of Consolidated, Community Living, Person/Family Directed Support (P/FDS) and/or Adult Autism Waiver (AAW) services
- Supports Coordination Organizations (SCOs)
- Administrative Entities (AEs)
- Other Interested Persons

PURPOSE:

The purpose of this communication is to inform all interested parties that the Consolidated, Community Living, P/FDS and AAW amendments were approved by CMS and become effective November 1, 2023. The waiver amendments are available on the Department of Human Services' (DHS) website.

DISCUSSION:

The Office of Developmental Programs (ODP) is pleased to announce that the

1. Variance Process/Form
2. Quarterly Conversations with Individuals
3. Comprehensive Analysis
4. QM Plan for CPS
5. Other Revisions
6. Revised CPS Provider Qualification for Enhanced Services
7. CPS Teleservices Codes
8. Recovery and Expansion Supplemental Payments

Variance Process for Community Participation Support

Variance Form Needed For:



Consolidated, Person/Family Directed Support and Community Living Waiver Variance Form

General Information

NAME OF INDIVIDUAL:	DOB:	MCI NUMBER OF INDIVIDUAL:
WAIVER THE INDIVIDUAL IS ENROLLED OR ENROLLING IN (CHOOSE ONE): <input type="checkbox"/> Person/Family Directed Support <input type="checkbox"/> Community Living <input type="checkbox"/> Consolidated		
SUPPORTS COORDINATION ORGANIZATION:		
SUPPORTS COORDINATOR NAME:	SUPPORTS COORDINATOR EMAIL ADDRESS:	

Type of variance being requested (check all that apply):	Corresponding section of the form to be completed:	Entity responsible for approval:
<input type="checkbox"/> Community Participation Support Standard (Request for individual to spend less than 25% of service time in community settings.)	Section 1: Community Participation Support Standard	ISP Team

A variance is still needed for CPS:

- 1:1 Enhanced Staffing;
- 2:1 staffing and/or 2:1 Enhanced Staffing
- When 14 hours daily of IHCS, Companion, and/or CPS

Section 1 – Community Participation Support

Provider 1 Information	Provider 2 Information
MPI:	MPI:
SERVICE LOCATION CODE:	SERVICE LOCATION CODE:
SERVICE LOCATION ADDRESS:	SERVICE LOCATION ADDRESS:
PROVIDER CONTACT NAME:	PROVIDER CONTACT NAME:
PROVIDER CONTACT EMAIL:	PROVIDER CONTACT EMAIL:

Reason for Variance Request (check all that apply):

A variance for participants who spend less than 25% of their time in community activities while they are receiving CPS is no longer required as part of the Community Participation Support service.

ISP team members will support the individual to determine:

- How often they want to receive services in the community and/or the facility
- What activities they want to participate in when they are in the community and/or the facility

Quarterly Conversations with Individuals

Community Participation Support (CPS) provides opportunities & support for community inclusion and building interest in & developing skills and potential for competitive integrated employment...**Each participant's preferences, choices, skills, strengths and interests may change based on their experiences, and as a result, providers must have conversations at least quarterly about community activities in which the participant would like to participate.**

“At least quarterly” = No more than three months can pass between conversations

- Best practice is monthly

Documentation of the conversation must be kept by the CPS provider

- These conversations should help the provider with creating quality progress notes. This should also help the provider with creating new outcomes based on the individual's preferences, choices, etc..

Comprehensive Analysis

CPS **should** include a comprehensive analysis of the participant in relation to the following:

1. Strongest interests & personal preferences for community activities,
2. Skills, strengths, & other contributions likely to be valuable to employers or the community, &
3. Conditions necessary for successful community inclusion and/or competitive integrated employment.

Begin having conversations w/ individuals at least quarterly

- First conversations should occur between 11/1/23 and 1/31/24.
- “At least quarterly” means no more than 3 months between the actual conversations.
- Best practice is monthly

Providers track CPS Community for each individual at a service location

- Have a process in place to start collecting data by 1/1/24, if not already occurring.
- Determine what % of individuals are at or above 25% CPS Community.

Quality Management Plan for Community Participation Support

Provider service location(s) where more than 10% of individuals who are receiving services are spending less than 25% of their time, on average, in community settings are **required** to include CPS in their QM Plan for that service location

Quality Management Planning and Implementation Documents – MyODP

- CPS goal and outcome statements
- CPS target objective – includes what you are working to improve, by how much, by when
- CPS performance measure – what will be used to measure progress over time
- Data source for CPS data
- Frequency of data collection (monthly) AND reporting (quarterly)
- Responsible person for the plan and its progress

- Action plan with items that describe activities to be engaged in to achieve the CPS target objective and address barriers
- Number and percent of individuals not receiving at least 25% of their services in community settings
 - Include baseline at the time of QM plan development with date
 - Include by month, for each quarter, in the status column of the QM plan's Action plan and quarterly report

Various methods used by the provider to offer options to receive services in integrated community settings

- Might include verbal conversation, conversations with visuals such as a calendar of events, using the computer to show pictures of events or places, etc..
- How often are options using listed methods offered?
- Consider who is providing the individual with this information - is it a 1:1 meeting with a program specialist, a meeting with the provider support team, and/or the family/caregiver(s)?

- Track monthly CPS in community % –
 - # who did not spend at least 25% CPS time as CPS Community / total # who received CPS
- Calculate the percent for the Quarterly Average (e.g., Q1 of SFY, July-Sept)
 - total # who did not spend at least 25% CPS time as CPS Community / total # who received CPS
- If QM plan is required, it must be implemented for at least 2 consecutive quarters that meet the required threshold, before it can be retired with successful practices embedded to ensure continued success

Calculating CPS Community %



7/2022	Total # of Individuals	# of Individuals <25% CPS Community	% of Individuals <25% CPS Community
Provider ABC	19	2	11%

	7/2022	8/2022	9/2022	Quarterly Average
Provider ABC	$2/19=11\%$	$3/21=14\%$	$1/22=5\%$	$6/62=10\%$

- ODPs QA&I process will be used to ensure compliance with the new CPS requirements
 - Non-scored/exploratory questions will be added to the Provider Tool in Cycle 2 Year 3 (FY 24/25)
 - Technical Assistance (TA) will be offered to assist CPS providers who consistently require a QM plan or did not complete it and should have, during the initial timeframe

Other Service Definition Revisions

A community hub could be a private home but is not the home of support staff **or any individual employed by, or on the board or similar committee responsible for executive decisions of, the provider of the service.** The participant's home may only serve as a hub on an occasional & incidental basis.

CPS is expected to result in the participant developing & sustaining a range of valued social roles & relationships; building natural supports; increasing independence; increasing potential for employment; and experiencing meaningful community participation & inclusion. Activities include supports for:

- Developing skills & competencies necessary to pursue competitive integrated employment;
- **Assisting participants with contacting relevant agencies and obtaining documents needed to access employment supports and services that educate participants on the impact of employment on current benefits;**
- Participating in community activities, organizations, groups, or clubs to develop social networks;

Prevocational services assist participants in vocational skill development, which means developing basic skills & competencies necessary for a participant to pursue competitive integrated employment and includes:

The development & implementation of a preliminary plan for employment that identifies:

- The participant's basic work interests, and
- Skills & gaps in skills for the participant's work interests, including how those will be addressed.

Situational assessments, which means spending time at an employer's place of business to explore vocational interests & develop vocational skills.

Enhanced levels of service are based on the participant's behavioral or medical support needs. At least one staff person must have one of the following certifications or degrees to provide enhanced levels of service to participants who do not require a nurse to provide the enhanced level of service:

- NADD Competency Based Clinical Certification.
- NADD Competency-Based Dual Diagnosis Certification.
- NADD Competency-Based Direct-Support Professional Certification.
- Registered Behavior Technician.
- Certified Nursing Assistant.
- Board Certified Assistant Behavior Analyst.
- Bachelor's Degree or higher in Psychology, Education, Special Education, Counseling, Social Work, Gerontology **or Therapeutic Recreation.**

Recovery and Expansion Supplemental Payments for CPS

- The proposed Recovery and Expansion Supplemental Payments for Community Participation Support (CPS), Supported Employment, Benefits Counseling, Small Group Employment and Supports Coordination in the Consolidated, Community Living and P/FDS Waivers were also approved by CMS in these amendments.
- For those providers that submitted applications for these payments, ODP will be reviewing utilization and billing data and calculating payment amounts. It is expected that payments will be processed no later than December 31, 2023.

Community Participation Support Teleservices Codes

Teleservices are the delivery of direct services (where direct service professionals are actively engaged with the individual/participant) using remote technology.

In addition, these procedure codes are now available to be used.

Community Participation Support may only be rendered to a participant in their Residential Habilitation home using teleservices when the participant:

- Routinely (routinely means regularly, as part of the usual way of doing things) participates in Community Participation Support services in-person outside the home; **and**
- Has a medical or behavioral condition that precludes their in-person participation for a temporary period of time not to exceed 26 consecutive weeks.

Providers who currently, or in the future plan to, provide CPS using teleservices must add the teleservices codes to each service location where this method of service delivery will be provided.

Information about how to do this is available in the HCSIS Learning Management System (LMS) under service management in a document titled Provider Updates Tip Sheet.

- Once this has been completed, the following process must be followed for individuals who are currently receiving CPS through teleservices:
 - The CPS provider must notify the SC as soon as possible that the appropriate teleservices codes are available to be added to that individual's ISP and provide the frequency and duration of the teleservices to the SC.
 - The SC must add the appropriate teleservices codes to the individual's ISP no later than 12/31/23. Starting 1/1/24, only W0065 and W0066 should be used for individuals who are receiving CPS using teleservices.

If teleservices will be a new method of delivering CPS services to an individual starting on or after 11/21/23:

- An ISP team meeting must be held prior to the SC adding any CPS teleservices codes to the individual's ISP.
- This meeting must include a review of the guidelines for utilizing teleservices in the current approved waivers, including the special instructions for CPS teleservices.

Procedure Codes



Procedure Codes Used for in person CPS and CPS Teleservices until December 31, 2023	Procedure Codes Used for in person Day Habilitation and Day Habilitation Teleservices until December 31, 2023	Procedure Codes Used for CPS or Day Habilitation Teleservices Starting No Later Than January 1, 2024
<p>Community Participation Support Community</p> <ul style="list-style-type: none"> • 1:2 or 1:3 W9351 • 2:3 W9352 • 1:1 W5996 • 1:1 enhanced W5997 • 2:1 W5993 • 2:1 enhanced W5994 	<ul style="list-style-type: none"> • >1:6 W7063 • <1:6 –1:3.5 W7064 • <1:3.5 –>1:1 W7065 • 1:1 W7066 	<ul style="list-style-type: none"> • 1:1 to 1:5 W0065 • 1:6 and above W0066
<p>Community Participation Support Facility</p> <ul style="list-style-type: none"> • 1:11 to 1:15 W7222 • 1:7 to 1:10 W7223 • 1:4 to 1:6 W7226 • 1:2 to 1:3 W7224 • 1:1 W7244 • 1:1 enhanced W9353 • 2:1 W7269 • 2:1 enhanced W9356 		

