



**Office for People With  
Developmental Disabilities**

# Direct Hands-On Therapy Changes in Supervised IRAs and Day Habilitation Sites 1/1/16

September 25, 2015

# Today's Topic: 1/1/16 Changes

- Hands-On Therapies provided in Supervised IRAs and Day Habilitation Sites:
  - Physical Therapy (PT)
  - Occupational Therapy (OT)
  - Speech Language Pathology (SLP)
- Treatment of Nutrition and Psychology
- Survey/Rosters will be distributed to identify program oversight and operations verses direct hands-on therapies in Supervised IRAs and Day Hab sites.
- Completed Survey/Roster will identify:
  - Direct Clinical Service
  - Oversight and/or Supervision
  - Training Staff
  - Other Indirect Service



# Rationale for Changes

- The policy regarding 1/1/16 changes reflects CMS' view that direct provision of therapy services funded in Supervised IRA rates or in Day Habilitation sites must be provided either in a certified Article 16 satellite clinic, main clinic, or through the new Independent Practitioner State Plan option.
- Waiver services cannot replicate services available through the State Plan.



# RECAP OF SUPERVISED IRA/CR CHANGES – 10/1/15



# Supervised IRA/CR Changes

- Effective 10/1/15 Supervised IRA and CR providers are responsible for paying for and providing the following services that are related to Residential Habilitation:
  - Nutrition
  - Psychological services (Behavioral Intervention and Support Services delivered by a Licensed Psychologist, Licensed Clinical Social Worker, or Behavioral Intervention Specialist)
- No separate Medicaid billing allowed for these services.



# Resulting Rate Changes 10/1

- Supervised IRA Residential Habilitation rates will be increased to incorporate these habilitation-related Nutrition and Psychology services that are now separately billed to Medicaid.
- Supervised IRA Residential Habilitation rates that already incorporate these Nutrition and Psychology services will not be adjusted. (Residential Habilitation-funded clinicians now provide these needed services.)



# **DIRECT HANDS-ON THERAPY SERVICES CHANGES – 1/1/16**



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# Rationale

- The Centers for Medicare and Medicaid Services (CMS) has directed fundamental changes in the way that OPWDD currently funds the delivery of direct clinical services
- We need to be clear about the therapies that are part of Residential and Day Habilitation and therapies that are provided to a person and available through the State Plan (separately billed to the Medicaid card).
- Nutrition and Psychology services delivered in the residence and the day habilitation program are critically important to the provision quality Habilitation services and therefore should be included in Supervised IRA/CR Residential Habilitation and Day Habilitation funding.



# Our Current Status

## Funding in Habilitation Rates for Clinician Staffing

- Day Habilitation and Supervised Residential Habilitation Rates may include funding for direct and indirect clinical staff
  - Direct Clinician Staff provide “Hands-on” services
  - Indirect Clinician Staff provide program operation/oversight & staff training
- Supervised IRA and Day Hab rates will be revised to remove funding of direct, “Hands-on” Clinician funding from the rates effective 1/1/16.



# What Can be Funded Within the Waiver Rate

- For Supervised IRA Residential Habilitation & Day Habilitation, clinical staffing can be funded in the rate, when it is related to:
  - Habilitation Service Planning
  - Program Oversight & the Provision of Habilitation
  - Staff Training



# What Cannot be Funded Within the Waiver Rate

- For Supervised IRA Residential Habilitation & Day Habilitation, clinical staffing cannot be funded in the rate, when it is related to:
  - A direct, “hands-on” therapy service that would otherwise be available through the State Plan.
  - This includes OT, PT, Speech (SLP) services that are provided by licensed professionals in accordance with a treatment plan.



# The Exceptions: Nutrition & Psychology

- Day Habilitation and Supervised Residential Habilitation will follow the same “rules.”



# Nutrition

- The Supervised Residence is responsible for the nutritional needs of the people who live in the certified residence. The Day Habilitation program is responsible for the nutritional needs of the person while at Day Habilitation
- Habilitation-related nutritional services include meal planning and monitoring, assessment of dietary needs and weight changes, development of specialized diets, diet education, and food safety and sanitation training.



# Psychology Services related to Supervised Residential/Day Habilitation:

- Behavioral assessment and intervention planning, delivery and review or monitoring of behavioral interventions, and behavior support services that are directly related to residential or day habilitation.
- These services must be provided by Licensed Psychologists, Licensed Clinical Social Workers, and Behavioral Intervention Specialists.



# Habilitation Provider responsibility for Nutrition & Psychology

- **Supervised Residential Habilitation:** Beginning 10/1/15, habilitation-related nutrition & psychology (behavioral) services must be paid for by the Supervised Residential Habilitation Provider.
- **Day Habilitation:** Beginning 1/1/16, habilitation-related nutrition & psychology (behavioral) services must be paid for by the Day Habilitation Provider.



# What Happens to the Clinician-Funding for Hands-on Services

- The funding for these hands-on therapies will continue, but must be provided under a compliant payment/billing methodology beginning on 1/1/16.
- The Options will be:
  - Transfer of the needed services to a Main or Satellite Article 16 Clinic location, or
  - Transfer to the new Independent Practitioner State Plan service



# Alternative Service Options

- The CON process is underway to create new Clinic Satellites (initial CONs due 10/19/15)
- The Alternative will be the Provision of Independent Practitioner (Preventive) Services. Additional Information forthcoming



# NEXT STEPS

# Survey of OT, PT, SLP, Psychology & Nutrition

- All providers of Supervised CRs/IRAs and Day Habilitation services will receive surveys from the Department of Health (DOH)
- Will Include Instructions for Completing a Survey of OT, PT, SLP provided as part of Residential Habilitation and Group Day Habilitation.
- Survey info will identify:
  - Direct Clinical Service
  - Oversight and/or Supervision
  - Training Staff
  - Other Indirect Service



# Survey & Clinical Activities

- Clinical Activities on the Survey are comprised of the following activities:
  - Direct clinic service provided to individuals by the clinician
  - Clinician oversight and/or supervision of staff
  - Time spent training staff to implement plans
  - Any other indirect service activities.



# Survey – Title Codes

- Survey will be broken out by CFR Position Title Codes:
  - 321 Psychologist (Licensed)
  - 322 Psychologist (Master’s Level)/Behavioral Specialist
  - 323 Psychology Worker / Other Behavioral Worker
  - 324 Social Worker – Licensed (LMSW, LCSW)
  - 325 Social Worker – Master’s Level (MSW)
  - 333 Occupational Therapy
  - 334 Physical Therapy
  - 335 Speech Language Pathology
  - 336 Dietician / Nutritionist



# Next Steps

- The survey will be distributed through OPA and results will be sent back to the Department of Health via email.
- Survey Results are due: October 25, 2015



# Questions



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