



Ohio Department of Mental Retardation and Developmental Disabilities

Ted Strickland, Governor

John L. Martin, Director

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To: County Board of MRDD Superintendents County Board of MRDD Waiver Contacts
County Board of MRDD COG Directors County Board of MRDD SSA Directors
Ohio Association of County Boards MRDD County Board of MRDD Business Managers
Ohio Provider Resource Association Certified IO Waiver Providers

From: Patrick Stephan, Deputy Director, Medicaid Development & Administration

Subject: General Guidance on revisions to ISP's, and related instruments

In keeping with our efforts around simplification, the purpose of this memo is to provide general guidance on our position related to some of the administratively burdensome practices associated with Individual Services Plans and cost projection instruments.

- ◆ Services delivered must be done so in accordance with an individual's ISP. The ISP should include the *typical* ratios at which services are delivered.
- ◆ Section (J)(3) of the SSA Rule (OAC 5123:2-1-11) provides guidance on when an ISP review or revision should take place. An important item of note from this section is that a review or revision should occur "whenever an individual's *assessed* needs, circumstances, or status changes."
- ◆ OAC 5123:2-13-07(J) (2) and OAC 5123-2-9-06(K) (2) provide that: "For purposes of clarity, a change in staff to waiver recipient service ratios does not automatically result in a change in the level of services received by an individual."
- ◆ Cost *projection* instruments (such as 2020, DRA and PAWS) should NOT be considered part of the ISP.
- ◆ When the cost projection instruments (including the 2020, DRA and PAWS) are not part of the ISP and there are changes to them, signed revisions to the individual's ISP are not always necessary. We do not believe that a revised, signed ISP is necessary to account for incremental fluctuations to the 2020 when there is not a substantive service change for the individual.
- ◆ A statement which could be included in an ISP to ensure cost projection flexibility is: "the team acknowledges and it is permissible for ratios to fluctuate periodically due to short-term, unplanned circumstances because such irregularities are impossible to predict. *This had been the intent of Appendix A as previously distributed in various training sessions.*"

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- ◆ We do not expect an SSA to include an *exact* projected dollar amount or funding level in the ISP.
- ◆ The SSA, team and service providers are encouraged to communicate actively, openly and often to ensure continuity of service particularly when service delivery is fluctuating. As a reminder, the sharing of cost projection instruments such as the 2020 is expected, as specified in the 5123:2-13-07.
- ◆ We do not feel it is best practice to update the 2020 or DRA in a consistent on-going manner for week to week variances. It should be updated and/or revised when services change *significantly* in the home (vacancy, new resident, permanent staffing ratio change, etc).
- ◆ There is no concrete answer to the question of how long County Boards & Providers should wait before revising data in the DRA when something changes within a setting. Each situation should be evaluated closely to determine the best course of action.
- ◆ It is very important for Counties and Providers to be on the same page when making changes to the DRA and PAWS, so that billing problems are avoided.

Case scenarios: DRA & 2020

Example 1:

Mike, Dennis and Ray have been sharing HPC services. Their ISPs state that they will receive HPC in the ratios of 1:3, 1:2, and 1:1. Ray moves out, and Mike and Dennis decide they do not want and can afford to live without a third roommate.

What needs to be revised?	
ISP(s)	Yes; Mike and Dennis’s ISP’s need to show ratios of 1:2 and 1:1. Ray’s will need to show whatever ratios will occur in his new home.
Cost projection instrument	Yes
DRA	Yes

Example 2:

Cheryl, Sandra, Carol, and Kay share HPC services and all need to have continual supervision when they are home. Typically they have two staff persons working with them for five hours per day on weekdays and eight hours per day on weekends. Their ISPs state that they will receive HPC in the ratios of 2:4; 2:3; 1:4; 1:3; 1:2; and 1:1. One of their regular staff persons resigns without notice and the agency is unable to find a substitute or hire a replacement for seven days.

What needs to be revised?	
ISP(s)	No; ISP ratios are still accurate
Cost projection instrument	No
DRA	No

Example 3:

Jim, John, and Dan share HPC services and their ISP's state that they will receive HPC in the ratios of 1:3; 1:2; and 1:1. Jim spends two weekends per month with his parents, but they are moving out of state so he will be at home on all weekends now.

What needs to be revised?	
ISP(s)	Jim – Yes, to reflect that reduction in natural supports and the increase in HPC services John & Dan – No, as the ISP ratios are still accurate.
Cost projection instrument	Yes – Jim is receiving more units of HPC so his cost of services will increase; John & Dan are receiving the same number of units of HPC, but their costs will decrease as there is an increase in number of units at 1:3 rather than 1:2.
DRA	Yes – Total shared units of HPC hasn't changed, but proportionate share of the total cost for each roommate has changed.

If you have any questions, please feel free to contact any of the following individuals from the Division of Medicaid Development & Administration:

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Thank you very much.