

Post Rate Study Provider Training: Community Residential Alternative (CRA) Services

- presented by -

DBHDD Division of
Developmental Disabilities

Agenda

- Rate Study Background
- Group Home Payment Rates
- 344-Day Billing Policy
- Tiers and Rate Categories
- Group Home Staffing Assumptions
- Additional Staffing Requirements and Request Process
- Specialized CRA Models
- Host Home



Rate Study Background

- DBHDD conducted a comprehensive rate study to review payment rates and policies for services provided through the Comprehensive Waiver (Comp) and New Options Waiver (NOW)
 - DBHDD contracted with the Burns & Associates division of Health Management Associates (HMA-Burns) to assist with the rate study
- Legislature and Governor agreed to fund the recommended rates, increasing total funding for all services by \$321.7 million

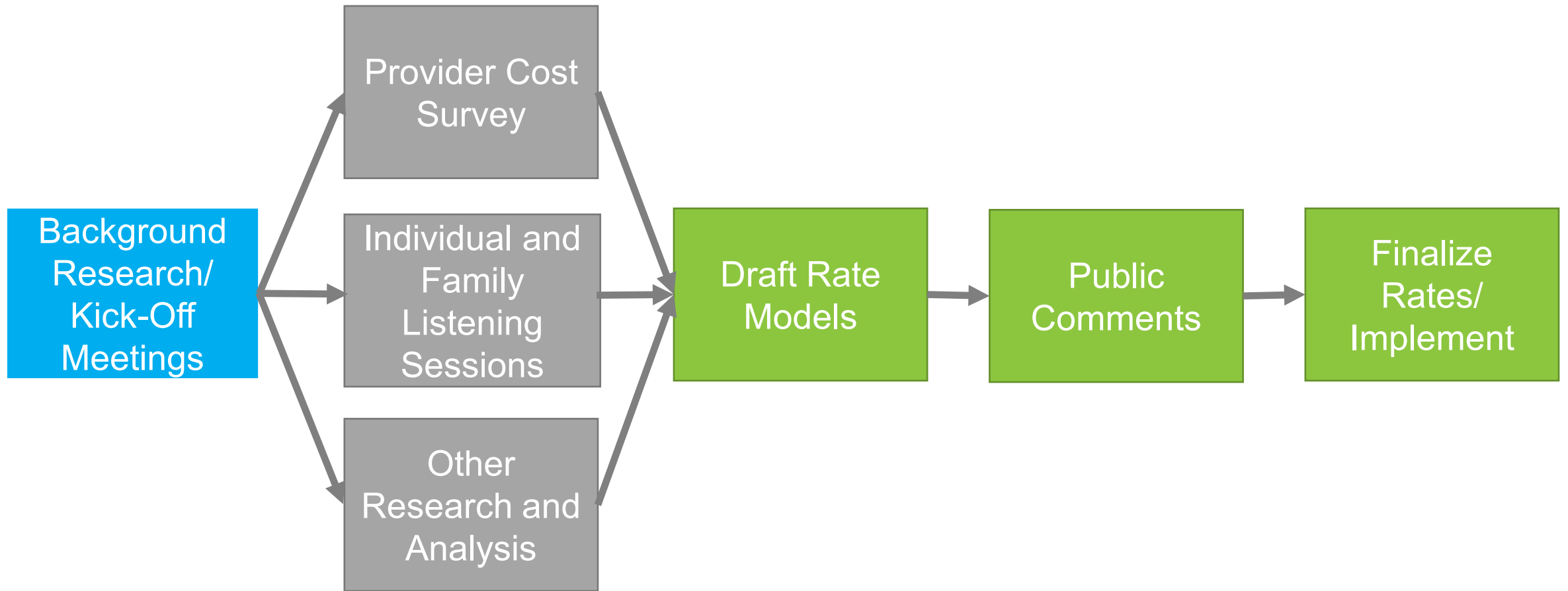


Rate Study Background (cont.)

- The rate study was designed to comply with federal requirements
 - Rate models are transparent
 - Rate models are stakeholder informed
 - Rate models ensure that payments “are consistent with efficiency, economy, and quality of care...”



Rate Study Process



Rate Study Process (cont.)

- HMA-Burns developed detailed rate models for most services
 - Models outline assumptions for major cost drivers (e.g., direct support professional wages and benefits, facility costs, administration, etc.)
 - *Assumptions are **not** mandates*
 - Cost assumptions considered provider cost data, external published data (such as Georgia-specific wage data from the Bureau of Labor Statistics), and public comments
- For CRA services, payment rates continue to vary based on an individual's level of need (group home rates also continue to vary based on home size)



CRA – Group Home Rate Model (4-Bed Model)

		Category 1	Category 2	Category 3	Category 4
Levels		1	2	3,4	5,6,7
Unit of Service		Day	Day	Day	Day
Direct Support Staff Wages and Benefits	- Direct Support Staff Hourly Wage	\$16.70	\$16.70	\$16.70	\$16.70
	- Employee Benefit Rate (as a percent of wages)	35.7%	35.7%	35.7%	35.7%
	Hourly Staff Cost Before Productivity Adj. (wages + benefits)	\$22.66	\$22.66	\$22.66	\$22.66
	<i>Productivity Assumptions</i>				
	Total Hours	40.00	40.00	40.00	40.00
	- Supervision and Other Employer Time	0.66	0.66	0.66	0.66
	- Individual Planning Meetings	0.09	0.09	0.09	0.09
	- Training	0.77	0.77	0.77	0.77
	- Paid Time Off	3.85	3.85	3.85	3.85
	"Billable" Hours	34.63	34.63	34.63	34.63
	Productivity Adjustment	1.16	1.16	1.16	1.16
	Staff Cost per "Billable" Hour	\$26.17	\$26.17	\$26.17	\$26.17
	<i>Staffing</i>				
	- Staff Hours per Residence per Week (see Appendix D)	181.0	221.0	266.0	362.0
	Allocated Staff Hours per Member per Week	45.3	55.3	66.5	90.5
	Weekly Staff Cost per Member	\$1,185.50	\$1,447.20	\$1,740.31	\$2,368.39

CRA – Group Home Rate Model (4-Bed Model, cont.)

		Category 1	Category 2	Category 3	Category 4
Supervision	- Supervisor Hourly Wage	\$24.49	\$24.49	\$24.49	\$24.49
	- Supervisor Benefit Rate (as a percent of wages)	27.9%	27.9%	27.9%	27.9%
	Hourly Supervisor Cost (wages + benefits)	\$31.32	\$31.32	\$31.32	\$31.32
	Weekly Supervision Cost per Home (2 homes per supervisor)	\$626.40	\$626.40	\$626.40	\$626.40
	Weekly Supervision Cost per Member	\$156.60	\$156.60	\$156.60	\$156.60
Mileage	- Number of Miles per Week per Residence	400	400	400	400
	Allocated Miles per Member per Week	100.0	100.0	100.0	100.0
	Amount per Mile	\$0.625	\$0.625	\$0.625	\$0.625
	Weekly Mileage Cost per Member	\$62.50	\$62.50	\$62.50	\$62.50
Admin. and Program Support	Weekly Cost per Member Before Admin. and Program Support	\$1,404.60	\$1,666.30	\$1,959.41	\$2,587.49
	- Program Support Cost per Member per Day	\$10.00	\$10.00	\$10.00	\$10.00
	Weekly Program Support Cost per Member	\$70.00	\$70.00	\$70.00	\$70.00
	- Administration Percent	10%	10%	10%	10%
	Weekly Administrative Cost per Member	\$163.84	\$192.92	\$225.49	\$295.28
	Total Cost per Member per Week	\$1,638.44	\$1,929.22	\$2,254.90	\$2,952.77
	Rate per Day	\$234.06	\$275.60	\$322.13	\$421.82
	Rate per Day at 344 Days per Year	\$248.35	\$292.42	\$341.79	\$447.57

CRA Group Home Payment Rates

Rate Category	Rate per Day	Code	Rate per Day	Code
	3-Person Residence		4-Person Residence	
Category 1	\$294.16	T2033-U1-UP	\$248.35	T2033-U1-UQ
Category 2	\$323.26	T2033-U2-UP	\$292.42	T2033-U2-UQ
Category 3	\$382.32	T2033-U3-UP	\$341.79	T2033-U3-UQ
Category 4	\$507.05	T2033-U4-UP	\$447.57	T2033-U4-UQ

Rates for homes with 5 or more Residents remain \$169.93 (T2033-U5-UR)

344-Day Billing Year – Overview

- Rates for standard Group Home and Host Home rates continue to be based on a 344-day billing year
 - Annual estimated cost divided by 344, producing rates 6.1 percent greater than a 365-day rate
- Since providers are paid for a full year of services after 344 days, they are limited to 344 billing days during a member's plan year
- Billing limit resets if an individual changes provider agency (but not homes within the same agency)



344-Day Billing Year – Example

- It is impossible for a provider to receive less revenue with a 344-day billing year
 - Example for a 4-bed, Category 4 rate, which has an assumed annual cost of \$153,964 (which translates to \$421.82 per day or \$447.57 based on a 344-day billing year)

Days Present	Revenue at 344-Day Rate	Revenue at 365-Day Rate
365	\$153,964	\$153,964
355	\$153,964	\$149,746
344	\$153,964	\$145,106
330	\$147,698	\$139,201

Tiers and Rate Categories

- The cost of shared services (e.g., group homes and day programs) varies based on intensity of staffing
 - Individuals with greater support needs generally require more intensive staffing
- DBHDD uses the Supports Intensity Scale (SIS) and Health Risk Screening Tool (HRST) to assess needs
 - Group Home, Host Home, and Daily Respite rates have been tiered since 2017



Current Criteria for Levels and Rate Categories

Group Home Rate Category	Level	Supports Intensity Scale		Health Risk Screening Tool
		Sum of Sections 2A, 2B, and 2E	Section 1B (Behavioral)	
Category 1	1	0 to 24	Less Than 7	Low Risk (HCL 1-2)
Category 2	2	25 to 30	Less Than 7	Low Risk (HCL 1-2)
Category 3	3.1	0 to 30	7 to 10	Low Risk (HCL 1-2)
	3.2	0 to 30	Less Than 11	Moderate Risk (HCL 3-4)
	4	31 to 36	Less Than 11	Low or Moderate Risk (HCL 1-4)
Category 4	5	37 to 52	Less Than 11	Low or Moderate Risk (HCL 1-4)
	6	Any	Less Than 11	High Risk (HCL 5-6)
	7	Any	11 to 26	Any

Host Homes and Daily Respite have only two rate categories: Cat. 1 (levels 1-4) and Cat. 2 (levels 5-7)

Host Home CRA Payment Rates

Rate Category	Rate per Day	Code
1 (Levels 1-4)	\$163.33	T2017-U1
2 (Levels 5-7)	\$220.11	T2017-U2

Tiers and Rate Categories (cont.)

- American Association on Intellectual and Developmental Disabilities (AAIDD), the author of the SIS, released a revised version of the SIS in 2023; changes include:
 - Reordering and rewording questions
 - Expanding the medical and behavioral sections
 - Renorming the Support Needs Index and component subscales
- With the revisions to the SIS, DBHDD is evaluating the criteria to assign individuals to levels
 - Updates have not been finalized so current criteria is being used



More information from DBHDD is forthcoming

Group Home Staffing Assumptions

- Staffing assumptions vary by home size
- Staffing assumptions vary by level of need
 - Staffing assumptions for categories 1, 2, and 3 were not changed
 - The most recent rate study added one full-time equivalent (40 staff hours) per week per home for category 4 homes
- Staffing models are not intended to be prescriptive and actual staffing plans are expected to meet the needs of the home and its residents



Group Home Staffing Assumptions (Four-Bed Homes)

	Category 1 Level 1	Category 2 Level 2	Category 3 Levels 3, 4	Category 4 Levels 5, 6, 7
<u>“Covered” Home Hours</u>				
Hours in a Week	168.0	168.0	168.0	168.0
Hours that Members Are Out of the Home	(30.0)	(30.0)	(30.0)	(30.0)
Allowance for Day Program Absences	<u>3.0</u>	<u>3.0</u>	<u>3.0</u>	<u>3.0</u>
Total Covered Hours for Residence per Week	141.0	141.0	141.0	141.0
Daytime Hours	85.0	85.0	85.0	85.0
Overnight Hours	56.0	56.0	56.0	56.0
<u>Base Staff Hours</u>				
Number of Staff on Shift During Daytime Hours	1.0	1.0	2.0	2.0
Number of Staff on Shift During Overnight Hours	1.0	1.0	1.0	2.0
Base Staff Hours	141.0	141.0	226.0	282.0
“Floating” FTE Per Week¹	1.0	2.0	1.0	2.0
Anticipated Floating Hours per Week	40.0	80.0	40.0	80.0
Total Hours per Home per Week	181.0	221.0	266.0	362.0
Hours per Client per Week	45.3	55.3	66.5	90.5

Group Home Staffing Matrix-Weekly Hours per Person

	Category 1	Category 2	Category 3	Category 4
4-Members (previous model)	45.3	55.3	66.5	80.5
4-Members (current model)	45.3	55.3	66.5	90.5
3-Members (previous model)	53.7	60.3	73.7	88.7
3-Members (current model)	53.7	60.3	73.7	102.0

Examples of Calculating Staffing Hours for a House



Reminder: The standard staffing for a house requires at least 1 staff on shift at all times 24/7



Reminder: The rate tier to which a person is assigned has assumed staffing levels

The number of staff hours assumed for a home could look like the following examples...

Examples of Calculating Staffing Hours for a House (cont.)

4 Member Residences	Tier Level	Daily Rate	Allocated Weekly Staff Hours in Base Rate	Daily Hours in Base Rate
Person 1	3	\$341.79	66.5	9.5
Person 2	3	\$341.79	66.5	9.5
Person 3	2	\$292.42	55.3	7.9
Person 4	4	\$447.57	90.5	12.9
Total Hours	-	-	278.8	39.8

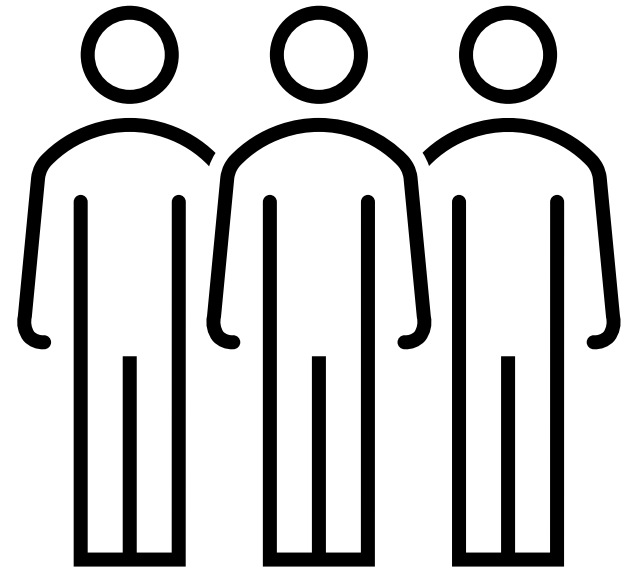
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In this example, the rates fund about 40 hours of staffing per day, allowing the home to manage staffing based on the tailored needs and schedules of individuals residing in the home

House Staff Schedule Examples 1-3

Next, we will examine 3 different examples of ways a provider could staff the previously described home.

Remember, this is a 4-person licensed home with two individuals at the tier 3 rate, one individual at the tier 2 rate and one individual at the tier 4 rate).



Example #1

Shift	Mon	Tues	Wed	Thur	Fri	Sat	Sun	Totals
12am -8am	DSP 1 (8 hr)	DSP 1 (8 hr)	DSP 1 (8 hr)	DSP 1 (8 hr)	DSP 1 (8 hr)	DSP 2 (8 hr)	DSP 2 (8 hr)	56
8am - 4pm	DSP 3 (8 hr)	DSP 3 (8 hr)	DSP 3 (8 hr)	DSP 2 (8 hr)	DSP 2 (8 hr)	DSP 3 (8 hr)	DSP 3 (8 hr)	56
8am - 4pm	DSP 7 (8 hr)	DSP 7 (8 hr)	DSP 4 (8hr)	DSP 4 (8hr)	DSP 4 (8hr)	DSP 4 (8hr)	DSP 4 (8hr)	56
4pm - 12am	DSP 5 (8 hr)	DSP 5 (8 hr)	DSP 5 (8 hr)	DSP 7 (8 hr)	DSP 7 (8 hr)	DSP 5 (8 hr)	DSP 5 (8 hr)	56
4pm - 12am	DSP 6 (8 hr)	DSP 6 (8 hr)	DSP 6 (8 hr)	DSP 8 (8 hr)	DSP 8 (8 hr)	DSP 6 (8 hr)	DSP 6 (8 hr)	56
Totals	40	40	40	40	40	40	40	280

Example #2

Shift	Mon	Tues	Wed	Thur	Fri	Sat	Sun	Totals
12am - 8am	DSP 1 (8 hr)	DSP 1 (8 hr)	DSP 1 (8 hr)	DSP 1 (8 hr)	DSP 1 (8 hr)	DSP 5 (8 hr)	DSP 5 (8 hr)	56
5am - 9am	DSP 8 (4hr)	DSP 8 (4hr)	DSP 2 (4 hr)	DSP 2 (4 hr)	DSP 2 (4 hr)			20
8am - 2pm						DSP 2 (8 hr)	DSP 2 (8 hr)	16
8am - 2pm						DSP 6 (8 hr)	DSP 6 (8 hr)	16
2pm - 10pm	DSP 3 (8 hr)	DSP 3 (8 hr)	DSP 3 (8 hr)	DSP 3 (8 hr)	DSP 3 (8 hr)	DSP 7 (8 hr)	DSP 7 (8 hr)	56
4pm - 12am	DSP 4 (8 hr)	DSP 4 (8 hr)	DSP 4 (8 hr)	DSP 4 (8 hr)	DSP 4 (8 hr)	DSP 8 (8hr)	DSP 8 (8hr)	56
Totals	28	28	28	28	28	40	40	220

Example #3

Shift	Mon	Tues	Wed	Thur	Fri	Sat	Sun	Totals
12am - 8am	DSP 1 (8 hr)	DSP 1 (8 hr)	DSP 1 (8 hr)	DSP 1 (8 hr)	DSP 1 (8 hr)	DSP 2 (8 hr)	DSP 2 (8 hr)	56
6am - 10am	DSP 2 (4 hr)	DSP 2 (4 hr)	DSP 2 (4 hr)					12
6am - 2pm						DSP 3 (8 hr)	DSP 3 (8 hr)	16
6am - 2pm						DSP 6 (8hr)	DSP 6 (8hr)	16
2pm - 10pm	DSP 7 (8 hr)	DSP 7 (8 hr)	DSP 7 (8 hr)	DSP 3 (8 hr)	DSP 3 (8 hr)	DSP 7 (8 hr)	DSP 7 (8 hr)	56
4pm - 12am	DSP 4 (8 hr)	DSP 6 (8 hr)	DSP 6 (8 hr)	DSP 4 (8 hr)	DSP 4 (8 hr)	DSP 4 (8 hr)	DSP 4 (8 hr)	56
4pm - 12am	DSP 5 (8 hr)	DSP 5 (8 hr)	DSP 5 (8 hr)	DSP 5 (8 hr)				32
Totals	36	36	36	32	24	40	40	244

What Is Additional Staffing (AS)?

- Provided to individuals with a high level of functional, medical, or behavioral need who require direct support or oversight beyond the level provided within traditional service descriptions
- May be authorized to provide higher ratio of staff
- Authorized on a temporary basis

Can be used in conjunction with:

- Community Living Supports Services
- Community Residential Alternative Services
- Community Access Group Services

For full-service definition, please see *Part III Policies and Procedures for COMP, Chapter 1700 and Appendix I in the Part II for the COMP and the NOW Waiver found at PolicyStat 02-1202* <https://gadbhdd.policystat.com/>

Enhanced Supports- Additional Staffing Services Eligibility

Must meet eligibility requirements outlined in COMP Part III Chapter 1700 and NOW/COMP Part II Appendix I

1. Extraordinary placement circumstances
2. Extraordinary needs
3. DBHDD clinical assessments
4. Documented need in ISP
5. Other documentation such as crisis safety plan and behavioral support plan

For Additional Staffing in a group home, providers are expected to first be delivering all hours funded in all residents' rates



Enhanced Additional Staffing Requirements

INDIVIDUAL

Individual Profile – the individual must have the following:

1. “Yes” to questions 2, 3, or 4 on the individual’s current SIS-C or SIS-A supplemental questions, or
2. Exceptional Behavior Support Needs score of 7 or higher on the individual’s current SIS-C or SIS-A

AND

STAFF PROFILE

All staff billing at an enhanced rate must meet one of the following:

1. Current Registered Behavior Technicians (RBT); and/or
2. Current Certification for Direct Support Individuals through National Association for the Dually Diagnosed (NADD); and/or
3. Current Positive Behavior Support Training Curriculum 3rd edition Completion (American Association on Intellectual and Developmental Disabilities (AAIDD))
4. Current Certified Nurse Aide (CNA)

Service	Unit	Rate
Additional Staffing, Basic	15-Min.	\$8.00
Additional Staffing, Enhanced	15-Min.	\$9.00

Steps to Obtain AS

1

Get a billable number for AS

2

Submit an Enhanced Supports Request

3

The Regional Field Office reviews request and processes

Step 1: Ensure Provider Has a Billable AS Number

1

Get a billable number for AS

- Provider must have a billable AS number for at least one I/DD approved active site.
- Provider can request a number through DBHDD Central Office by sending an email and attaching a copy of their current insurance to:



MHDDAD-serviceAPPS@dbhdd.ga.gov

and

Genevieve.McConico@dbhdd.ga.gov

Step 2: Submit an Enhanced Supports Request

2

Submit an Enhanced Supports Request

Application

<https://dbhdd.Georgia.gov/provider-toolkit-0>

Needed
Documentation

- Describe all current services
- Provide justification for additional services

Submit

Region#enhancedsupports.dd@dbhdd.ga.gov

Step 2: Submit an Enhanced Supports Request

2

Submit an Enhanced Supports Request

Utilization Manager

Region 1

Katie King

Region1enhancedsupports.dd@dbhdd.ga.gov

Region 4

Melanie Parker

Region4enhancedsupports.dd@dbhdd.ga.gov

Region 2

Jessica Young

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Region 5

Terrence Welch

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Region 3

Rhonda Flint

Region3enhancedsupports.dd@dbhdd.ga.gov

Region 6

Pamela Byrd

Region6enhancedsupports.dd@dbhdd.ga.gov

Documents/Records Needed with Submission of Application

BSP, Safety/Crisis Plan, Behavior Data Summaries and Tracking

Medical Support Plan

Healthcare Plans and Protocols

Relevant Legal Documentation

Recent Incident Reports

Current Home Staff Schedule and Requested Home Staff Schedule

Additional Information: Service Plans, School Records, IEPs, Personal Statement from Past Caregivers, Proof of Home Modifications, Doctor's Notes, updated HRST, Hospitalizations, etc.

Step 3: Request Reviewed by the Region

3

Request Reviewed by the Region

- Utilization Managers (UM) reviews request and documentation within 5 business days
- Provider has 10 business days to submit additional information
- Enhanced support request determination within 60-90 business days

Request Approved

UM requests clinical assessment team to complete Nursing Assessment and/or Behavior Assessment (CABS).

More Information Requested

UM sends a request via email for more information with details on what information is needed.

Request Denied

UM denies request based on Appendix I outline. See NOW/COMP Part II Manual Appendix I.

How to Appeal a Denial

- An individual has the right to appeal a decision.
- The appeal process and instructions are outlined in the Adverse Action – also known as the denial letter – which is sent to the individual/guardian via certified mail and emailed to provider and relevant DBHDD staff.
- There are 2 options to appeal – a division review and a fair hearing. The individual retains their right to a hearing if they request a division review first.
- To appeal, an individual (and/or guardian as applicable) must provide written request to DBHDD within 30 days of receipt



Specialized CRA Models

- Three new specialized CRA models were developed as part of the rate study
 - CRA – Behaviorally Focused
 - CRA – Specialized Transitional
 - CRA – Intensive (customized rate)



Behaviorally Focused and Specialized Transitional Models

- Staffing assumptions

Staff Type	Staffing Intensity	Behaviorally Focused	Specialized Transitional
DSP	24/7	1:1	1:1
RN	On-Call	1:6	1:4
LPN	40 Hrs/ Wk	1:4	1:6
BCBA	On-Call	1:6	1:12



Behaviorally Focused and Specialized Transitional Models (Cont.)

- All admissions and reauthorizations for Specialized CRA must be approved by DBHDD
- Designed to be short-term placements, typically lasting 3-6 months
- Provided in settings of four or fewer people (and not provided in a participant's own home, family home, or other setting where CLS is provided)
- Providers delivering specialized CRA must currently operate at least two existing CLA sites



Behaviorally Focused and Specialized Transitional Models (Cont.)

- Doubles the program support cost of a traditional Group Home
- Doubles the assumed administrative expense of a 4-bed Tier 4 Group Home
- Rates per member per month:
 - Behaviorally-Focused: \$34,424.63
 - Specialized Transitional: \$37,121.50
- Individuals receiving less than 15 days of service in a month will bill one-half the monthly unit



Intensive Model

- Staff hours in rate model are customizable:
 - Weekly DSP hours
 - Weekly RN hours
 - Weekly LPN hours
 - Weekly BCBA hours
- All other factors are 'fixed' (e.g., wage and benefit levels cannot be customized)
- Doubles the program support cost of a traditional Group Home (increasing from \$10 to \$20 per day)
- Doubles the assumed administrative expense of a 4-bed Tier 4 Group Home



Intensive Model (cont.)

- All CRA Intensive services must be authorized prior to delivery by the applicable DBHDD field office
- Participants receiving CRA Intensive must live in small settings for three people or fewer
- May not be provided to individuals residing in their own home or their family's home (in any residence in which CLS are provided)
- Providers delivering CRA Intensive must currently operate at least two existing CLA sites *or* operate a Community Service Board in Georgia



Host Home

- Modest changes to rate model structure, including:
 - Additional mileage costs for the recruiter and trainer positions
 - Increased home payment assumptions (Category 1 increased from \$90 to \$110 per day and Category 2 increased from \$130 to \$155 per day)
 - Agencies will continue to be required to pass-through at least 60 percent of the total payment to the home provider



A pair of black-rimmed glasses with silver-colored hinges and temples is resting on a document. The document contains Finnish text, including a table with columns labeled 'Kehittämistoimenpiteet' and 'Yhteensä'. The text is slightly blurred, and the overall tone is professional and contemplative.

Questions?

How Do I Stay Informed?



If you have any questions,
please reach out to our Provider Information network:

<https://dbhdd.georgia.gov/be-connected>

Rate Models and Rate Study Materials Available Online

- Final rate models are available [here](#).
- A presentation outlining changes to the proposed rate models that have been integrated into the final rate models can be found [here](#).
- The results of the provider cost survey that was administered as part of the rate study can be accessed [here](#).
- Other rate study materials are published [here](#).



A background image showing several hands of different skin tones being held together in a supportive gesture. The hands are layered, with some in the foreground and others slightly blurred in the background, creating a sense of depth and care.

BE D·B·H·D·D

Georgia Department of Behavioral Health & Developmental Disabilities

