

CAP IDD Meeting Minutes – September 11, 2024

In attendance: Denise Cavanaugh, IDD Committee Chair; Angela Kutz, Pressley Ridge; Karen Jacobsen, Emmaus Community; Stacey Dowden, Milestone; Stacey Fitzgerald, Pittsburgh Mercy; Gail Quigley Smith, Pittsburgh Mercy; Courtney Walker, CLASS; Dave Bosley, Step By Step; Kolleen Johnson, Achieva.

Guest: Carol Ferenz, RCPA

Monthly Meeting – we will be moving our meetings from the 2nd Friday of the month to the 3rd or 4th Friday, starting in October. Meetings will be held at Step By Step’s new Western Administrative offices located at Foster Plaza 7 in Greentree. Meeting time will be 11:30 – 1pm.

Remaining Schedule for 24/25:

- October 25th
- November 22nd
- December 20th
- January 24th
- February 28th
- March 28th
- April 25th
- May 23rd

Licensing Updates:

A question was raised regarding whether there will be a change to the 6400 regulations pertaining to TB tests being required every 2 years; Regulatory Compliance Guide (RCG) states that TB is required upon admission (or hire, if employee), but is not required beyond that as long as there is documentation on file from a physician stating a TB test is not needed, or the individual is not experiencing symptoms.

- A change to the regulations is not anticipated; however, licensing staff have been advising our residential providers to follow the RCG guidelines
- This language is not currently consistent with what is printed in the RCG for CPS services.

Provider assessments matching what is in the ISP is still a big issue.

- Providers should ensure that they keep a record of correspondence indicating that assessment information has been shared with the Supports Coordinator so that the ISP can be updated accordingly.

- Licensing reps are questioning a lot of assessment items for those who live semi-independently.

Discussion: It is exceedingly difficult to ensure that the ISP is always up to date; Providers are not in control of updating content. Even if they are keeping documentation that they sent updates to the Supports Coordinator, providers are expected to train staff on the content in the ISP; so, if the ISP is not updated timely, providers are at risk of non-compliance. ***A solution would be to allow providers to train staff based directly on the assessment content they completed most recently.***

Incident Management/Investigations:

Continued inefficiencies in this area; providers still being required to conduct investigations, despite APS, and sometimes even law enforcement, completing one as well. Beyond providers having to re-allocate scarce resources to the process, with each witness interview conducted, the risk of re-traumatization of those involved increases.

There has been an increase in requests of providers to conduct investigations based on CMS claims reviews.

These requests often occur months after the fact making it highly unlikely that information gathered through the CI process will be accurate, or in some cases, even possible to retrieve.

- ODP has hired a consultant to evaluate and streamline the processes outlined in the EIM Bulletin.

SIS Assessments:

- **Discrepancy form:** There was a long discussion regarding whether there is a different process/form for 2024 (vs. 2023). It seems providers who submitted discrepancies for 2023 were successful in getting reassessments; while there have been lengthy delays in getting a response from ODP on 2024 submissions.
Follow up: There were 2 processes implemented by ODP, one to request reassessments for individuals whose SIS score fell by 2 or more Needs Group Levels (ODP ANN – 24-044). These needed to be submitted by 7/8/2024; the other a review process for SIS-A discrepancies (ODP ANN – 24-028); the discrepancy form must be submitted within 4 months of the SIS interview.

Performance Based Contracting:

- 46 providers submitted for tier assignment during the August review period, including a couple of CAP orgs.
- Incident Management numbers pertaining to late reporting, timely finalization, % of abuse/neglect allegations, among others, will have a significant impact on tier assignment. A recommendation has been made to implement a formal dispute process for incidents designated as late submission or not finalized timely, because there are many reasonable factors that could lead to these circumstances.
- We discussed collaboration with each other to help meet PBC requirements in various areas, including Wellness Programs based on HRST (Health Risk Screening Tool) data.
 - Denise will send an email to the group to see if there is interest in getting nursing teams together to collaborate in this area.
- RCPA
 - Annual Conference coming up 9/23 - 27; our own Kim Sonafelt will be honored for her leadership and innovation. Congratulations Kim!
 - On-line registration closes this week!
 - Rate appeal webinar scheduled for next week.
 - 6100 regulations regarding “actuarially based rates” seem not have been followed based the latest publication (6% increase for Residential, 8% for Non-Residential)
 - Providers have until Sept 30th to file an appeal