Individual and Family Support (IFS) Waiver

Virtual Public Forum

Department on Disability Services

Monday, May 23, 2022
Proposed Changes

The District is proposing to continue all utilized services and supports for people currently enrolled in the District’s IFS Waiver Program. The District will be expanding IDD waiver eligibility to people with Developmental Disabilities (DD) without a diagnosis of an Intellectual Disability (ID). The District will add new services to include remote supports services, Participant-Directed Services (PDS) and Individual-Directed Goods and Services (IDGS).
Proposed Changes – 3 Types

1. Service changes to include new services and updating scope of specific services

2. Systemic changes that relate to clarifying roles, eligibility and enrollment, reserved capacity and staff vaccination requirements

3. Set reimbursement rates for proposed new services and DSP supplemental payments
Proposed Service Changes: Assistive Technology

The District is proposing to modify Assistive Technology services by adding additional allowable assistive technology items which includes virtual assistants/smart speakers, environmental controls devices, applications for prompting, and guidance and navigation.

Not included in the Public Notice:
The District is proposing to also modifying the requirement for an assistive technology assessment to include assistive technology that costs under $1,000, no longer requires an assessment. Providers can acquire assistive technology based on the person’s support team justification of need in the Individual Service Plan (ISP).
Proposed Service Changes: Assistive Technology Cont’d

Not included in the Public Notice:
The District is proposing to modify Assistive Technology that costs over $1,000 must include an assistive technology assessment conducted by a professional of: occupational therapy; physical therapy; speech, hearing, and language services; assistive technology professional (RESNA Certified); Certified Enabling Technology Integration Specialist (ETIS) employed by a SHIFT accredited waiver service provider; or another comparable national accreditation body, as approved by DDS.

The District is proposing to modifying provider qualifications for assistive technology services to include Certified Enabling Technologies Specialist Certification and Accredited Technology First Organizations for assistive technology services.
Proposed Service Changes: Remote Supports Services

The District is proposing a new service, remote supports. Remote Supports Services will enable persons to be more independent and less reliant on staff to be physically present to receive support. The remote supports service will be available for the following waiver services:

- Assistive Technology
- Behavioral Supports
- Bereavement Counseling
- Creative Art Therapies
- Day Habilitation
- Employment Readiness
- Family Training
- Nutrition Evaluation/Consultation
- Occupational Therapy
- Parenting Supports
- Sexuality Education
- Speech, Hearing and Language
- Supported Employment
- Fitness Training
The District is proposing Remote support services to be a separate billable service with a specialized rate different from the in-person service delivery rate in some circumstances. Remote support service rates for the following services will maintain the same rates: speech, hearing and language services, occupational therapy services, bereavement counseling, fitness training services, nutrition evaluation/consultation services, sexuality education services, supported employment and creative art therapies services will maintain the same rates.
Proposed Service Changes: Participant-Directed Services (PDS)

The District is proposing a new service option, Participant-Directed Services (PDS). Participants, or their representatives if applicable, have decision-making authority over certain services and take direct responsibility to manage their services with the assistance of a system of available supports. The PDS delivery model is an alternative to traditionally delivered and managed services, such as an agency delivery model. PDS allows participants to have the responsibility for managing all aspects of service delivery in a person-centered planning process. The PDS delivery option will be offered for the following services:

- In-Home supports
- Individualized Day Supports (IDS)
- Companion
- Respite daily
- Individual-directed goods and services (IDGS)

The District is proposing to modify the scope of companion services to allow the service to be rendered by the individual’s relative when participant-directed.
Proposed Service Changes:

**Individual-Directed Goods and Services (IDGS)**

The District is proposing a new service, Individual-directed goods and services (IDGS). IDGS are services, equipment, or supplies not otherwise provided through the IFS Waiver or State Plan. Furthermore, IDGS are only available if the individual does not otherwise have the funds to purchase the good or service or the good or service is not available through another source.

IDGS are purchased from the participant-directed budget. Experimental or prohibited treatments are excluded. These goods and services must address an identified need in the participant’s Individual Service Plan (ISP). IDGS are only available to waiver participants who are enrolled in the Participant-directed Services (PDS) program.
Proposed Systemic Changes

The District is proposing the following changes and systems improvements to comply with statutory requirements, clarify roles, eligibility and enrollment, reserved capacity and staff vaccination requirements:

- **Appendix B:**
  - Clarifies roles and responsibilities of Health Insurance Analysts and Medicaid Waiver Specialists in completing and submitting the Medicaid recertification form to the Department of Human Services, Economic Security Administration at least sixty (60) days prior to the expiration of the person’s Medicaid eligibility period.
  - Modifies the waiver enrollment process. The proposed modification will base enrollment into the IFS waiver on the individuals’ identified needs. The Interdisciplinary Team will discuss services based on the individuals’ specified need(s) and the most appropriate waiver will be explored.
Proposed Systemic Changes

- **Appendix B:** The District is proposing to modify who is eligible to receive waiver services by expanding IFS Waiver services to individuals with DD without a diagnosis of an Intellectual Disability (ID). The proposed DD eligibility expansion also incorporates modifications to the definitions of DD and ID and amends the waiver eligibility criteria to acknowledge that onset of ID can occur after age eighteen (18) up to age twenty-two (22). Whereas criteria before required onset of ID prior to age eighteen (18).

- Adds a vendor for Financial Management Services (FMS)/Support Broker entity to provide financial management, information and assistance services for participants in the PDS program.

- Adds COVID-19 vaccination requirements for direct care staff to align with DC Health requirements.
Proposed Systemic Changes

- **Appendix B:** The District is proposing to modify the reserved capacity for CFSA to DDS and ICF/IDD reserved slots. The District will change reserve capacity from 15 to 10 slots per year for each year of the waiver for young adults who are wards of the District and are transitioning from the Child and Family Services Agency (CFSA) to adult services in DDS/DDA. The District will change reserve capacity from five (5) to three (3) slots per year for each year of the waiver to transition people who seek to move from ICF/IDD settings to HCBS waiver services. Adds two (2) reserved capacity slots for people transitioning from the IFS waiver to the IDD waiver.
Proposed Systemic Changes

- **Appendix I: Reimbursement Changes** - Adds a supplemental payment for waiver services. The District will be paying supplemental payments to qualifying waiver providers to support increased wages for defined DSPs starting FY2023 and as necessary annually to alleviate the workforce shortage. The District will make an annual evaluation of the supplemental payment to determine if the result of the supplemental payment warrants an increase in the base wage of the DSPs used in the rate calculation to maintain sustainability.

- Adds rate-setting methodology for participant-directed services. The rate-setting methodology used for Medicaid services delivered through traditional agency-based model will remain the same for services that are participant-directed. Participants who elect to use PDS will determine hourly rate paid to their participant-directed workers within range set by DHCF, which falls between District’s established living wage and the rate paid to PCAs delivering Waiver services through the agency-based model. The Vendor Fiscal/Employer Agent Financial Management Services (VF/EA FMS) - Support Broker entity will assist participants who elect to use PDS through provision of financial management and support broker services and will receive a per member per month (PMPM) payment for provision of these services.
Questions?

Written Comments on the proposed IFS Waiver amendment shall be submitted to:

Katherine Rogers, Director, Administration of Long-Term Care Department of Health Care Finance, 441 4th Street, NW, Suite 900S, Washington, D.C. 20001, or via email at Katherine.rogers@dc.gov during the thirty (30) calendar day public comment period, beginning April 29, 2022, and ending May 30, 2022.