

## **ODDS Expenditure Guidelines v.14 Comments and Responses**

ODDS appreciates those who took the time and opportunity to review this proposal. We value your input in making our program better.

Comments that are similar may have been aggregated; others paraphrased. ODDS has made every effort to address all concepts noted in the comments. Grammar and formatting errors that were noted in comments are not addressed but are appreciated.

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A commenter feels that they need more information about how much Service Related Community Transportation (OR005) to authorize.

Response: Per mile transportation, both OR004 and OR005, should be authorized in an amount that will meet the person's needs related to transportation. The cost of shared rides is pro-rated at the time reimbursement claims are made.

Several commenters feel that with multiple new modifiers in use, ISPs will become significantly more complicated, long, and difficult for people to understand.

Response: A major goal of the Compass Project is to redesign the current ISP and ISP process. This feedback will be considered during that part of the project.

Commenters asked for additional clarification around 1:1 services and what each modifier represents.

Response: Additional clarification was incorporated.

Commenters suggested format changes to rate tables and to make clearer which modifiers required exceptions to be approved.

Response: These suggestions were incorporated.

A commenter wanted to know if Professional Behavior Services are authorized with RU, are there any additional documentation requirements.

Response: Not at this time.

A commenter wanted to know if RU could be authorized if behavior professionals closer to the individual are unavailable to provide supports.

Response: Yes. Wording was added to clarify.

A commenter wanted clarification around using attendant care for pets.

Response: Assisting an individual with communicating with a vet is appropriate. Supporting a person with IDD as they feed, groom, or perform household tasks associated with a pet is appropriate. Doing those tasks for or in place of the person is not appropriate.

Several commenters offered suggestions to make various point in the document more clear, including around per mile transportation types and DSA.

Response: These suggestions were incorporated.

A commenter requested more information about the two types of in-home agencies.

Response: Additional information is being developed, but it will be separate from the expenditure guidelines.

A commenter had concerns and suggestions about the use of the procedure code/modifier OR401WV (Job Coaching without VR).

Response: A review of [PT-22-059](#) should address the concerns.