

ODDS Engagement and Innovation Feedback
“Rates and Dates Worker Guide- Timelines for Agency Provider Rate Changes”
March/April 2022

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.

- A commenter expressed that the policy is clear and does not appear to impact priority populations.
- A commenter expressed that the timelines captured in the document appear to be generous, allowing for transition or to make a request for an exception.
- Commenters provided feedback that the concepts seem complex, but offered that this may be “the sort of thing that is harder to explain that it is to operationalize”.
- Several commenters expressed that this presentation did not seem intuitive and had questions about in-home hours.

ODDS Response: This worker guide is specific to provider agency rates and does not apply to allocation of or changes to volume of in-home hours.

- A commenter suggested providing a list of scenarios and the timelines associated with these events.

ODDS Response: A table with the list of scenarios and timelines was created and added to the guide.

- A commenter asked about application of timelines to in-home hours and reductions.

ODDS Response: This worker guide is only applicable to provider agency rates and is not to be applied to in-home hours.

- Several commenters expressed appreciate for the illustrations provided in the guide.
- A commenter expressed that training might be helpful.

ODDS Response: ODDS offers a monthly transmittal call technical assistance session. If, following the monthly transmittal session and based on questions received or requests for additional support, more training is needed, then ODDS will offer this assistance.

- A commenter stated that they believe the policies related to rates and timelines is impactful so that compensation matches level of support provided and allows for an exception based on a person's needs.
- A commenter provided the recommendation that a screening committee or a policy around the case manager effectively collaborating with the full ISP team rather than conversations one at time with the belief that a full team meeting is the best way to access the need for an exception.

ODDS Response: ODDS agrees the involvement of the individual's ISP team is important to the exceptions process. There is room for flexibility on how collaboration takes place to allow for planning and support to be matched to an individual's needs, preferences, and personal situation.

- A commenter suggested addition of the clarification that the case manager must provide residential providers with a copy or summary of the ONA.

ODDS Response: This statement was added to the document.

- A commenter suggested the application of the policy be that the rate increase based on an ONA should be effective the date of the assessment interview rather than the ONA submission date.

ODDS Response: The policy is the effective date of a rate increase based on an ONA is the date of the ONA submission.

- A commenter requested more specific timelines for when a provider is notified of a new assessment result and rate change.

ODDS Response: Additional language was added to the worker guide reflecting the weekly notification that will be issued by ODDS.

- A commenter requested alternate wording to describe the implementation timelines for a decrease in rate effective date to the second full month.

ODDS Response: The alternative suggestions was appreciated but the descriptor of the first day following the full month after the assessment best describes the timeframe. The concern with second full month is that there is potentially a greater risk of inaccurate application of the timelines.

- A commenter suggested language related to the issuance of a NOPA (Notice of Planned Action).

ODDS Response: Language related to a NOPA is not included because a NOPA does not apply to a provider rate change. A NOPA is applied to situations where there is a denial, termination, or reduction of services. A change in provider rate is not considered on these actions.

- A commenter asked about the use of the terminology “case manager”

ODDS Response: Case manager is used as an all-encompassing term to apply to Services Coordinators, Personal Agents, and ODDS Case Managers.

- A commenter asked if there was a defined process and timeline for requesting exceptions

ODDS Response: Agreed. Timelines, process, and policies related to exceptions are contained in Exception Worker Guides and training documents.

- A question was asked how a need for retroactive approval is indicated

ODDS Response: The ODDS Exceptions for allows for this to be requested and explained.

- A commenter expressed confusion about a “change in need assessment” and stated that there is no such thing.

ODDS Response: There are change in need assessments. These are assessments that are necessary due to or reflect that an individual has a change in support needs and these assessments are completed by a certified ONA assessor.