



Frequently Asked Questions Compass In-Home Hours Implementation

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Resources

- Upcoming In-person and virtual trainings:
<https://www.oregon.gov/odhs/compass/Pages/training.aspx>
- Resources for people and their families:
<https://www.oregon.gov/odhs/compass/Pages/resources-individuals.aspx>
- Maintenance of Effort information:
<https://www.oregon.gov/odhs/providers-partners/idd/workerguides/wg-ihh-maintenance-of-effort-period.pdf>

Maintenance of Effort period	
Question	Answer
If a person's plan renews later in 2024, could a change form be completed in 2024 to access their service group hours? Or, do they need to wait until the ISP renews in 2024 to access the service group hours?	No, a change form cannot give the person access to their service group hours prior to their ISP renewal in 2024. This transition is rolling out as plans renew during 2024.
If a person needs more hours to meet their needs than their ANA	ODDS is committed to meeting every person's disability related needs. If the

<p>or CNA allows and their ONA service group maximum is higher than their ANA or CNA level, can the person access their service group hours before their plan renews in 2024?</p>	<p>only reason for the exception request is accessing increased hours sooner, that will not be approved. However, if current supports are not meeting a person's needs or there is a change in need, those requests will be considered as they are today.</p>
<p>For a person new to in-home services during the maintenance of effort period, what assessments are needed?</p>	<p>To comply with our commitments for receiving American Rescue Plan Act money, people new to in-home services will need to have both an ANA or CNA and an ONA. A person new to in-home services includes a person who has had a break in in-home services for over a year. The ISP authorization can be no fewer than the hours resulting from the ANA/CNA, and if the service group is higher, the ISP team can determine the number of hours to include in the ISP up to the limit of the service group.</p>
<p>For a youth who turns 18 during 2024, what assessments are needed?</p>	<p>If the youth was enrolled in services during 2023, the youth will retain their CNA summer hours until their ISP renews in 2024. If the person has unmet needs and needs an increase in hours, an exception can be requested.</p> <p>The CNA summer hours are also the minimum number of hours that can be included in their 2024 ISP. If their service group is higher, the ISP team can determine the number of hours to include in the ISP up to the limit of the service group.</p>

<p>Will anyone with authorized in-home services in their ISP that started in 2023 need a new ANA or CNA after January 1, 2024?</p>	<p>No, only ONAs will be completed for people currently authorized for in-home services after January 1, 2024.</p>
<p>If a person has a change in their support needs in 2024, which assessment should we do?</p>	<p>The ONA. No new ANA/CNA should be completed in 2024 for people already receiving in-home services.</p> <p>If the change in need takes place prior to the person’s ISP renewal in 2024 and the person needs more support hours than their 2023 ISP authorization, an exception must be requested to authorize more than the ANA/CNA hours.</p> <p>If the change in need takes place after the person’s ISP renewal in 2024, the assigned service group can set the service level in the ISP, or an exception can be requested if the upper limit of the service group cannot meet the person’s needs.</p>
<p>For a child that has been using summer hours year-round, will the child continue to have access to the summer service group hours year-round when the ONA is used to set the service level?</p>	<p>A child’s summer hours that were authorized in their 2023 ISP are the minimum hours that can be authorized during MOE for the full plan year. However, there are situations where the child may have summer and school hour changes if the assigned service group is higher for either part of the year. See the Maintenance of Effort Worker Guide Appendix B for examples:</p> <p>https://www.oregon.gov/odhs/provider-s-partners/idd/workerguides/wg-ihh-maintenance-of-effort-period.pdf</p>

<p>Will notices be mailed out in 2024 in preparation for this change?</p>	<p>Letters went out in June 2023 informing people of the hour ranges for their assigned service groups. Additional resources available now can be used for any conversations about reductions, other supports, and exceptions. Resources include:</p> <ul style="list-style-type: none"> • Video: Tips to get ready for your planning meeting https://youtu.be/NGnYXO6bSEY • Flyer: Your Plan https://www.oregon.gov/odhs/compass/Documents/your-plan-in-home-hours-transition-en.pdf • FAQ: Common Questions https://www.oregon.gov/odhs/compass/Documents/in-home-hours-faq-en.pdf <p>More opportunities and resources for people receiving services and their families to learn about this change will be available in 2024.</p>
<p>What about the injunction that maintained the ANA and CNA version C hours?</p>	<p>ODDS has been under an injunction that prevents the reduction of in-home hours since 2017. The injunction was a result of a lawsuit after a system wide in-home hours reduction. ODDS is working to resolve the injunction. Creating the ONA and SG framework was part of work needed to lift the injunction. This transition is fulfilling that requirement.</p>

<p>Are the service group limits populated into eXPRS Plan of Care (POC)?</p>	<p>There is not a validation to the service group limit in POC. CMEs will continue to enter the limit into the plan line from the assessment that is used to set the hour limit.</p>
<p>Should service coordinators and personal agents begin preparing clients who have ANA/CNA hours above their service group hours to expect a change after the end of the Maintenance of Effort period?</p>	<p>People should be given accurate information about how the change to the service group hour ranges will impact their services after the Maintenance of Effort Period. This extended transition time and phased-in approach is intended to allow for thoughtful planning and preparation, including:</p> <ul style="list-style-type: none"> • Exploration of the supports and resources that are available to you, both paid and those present in your social network and community. • Identification of other DD services that can meet your needs, like assistive technology. • Time to submit an exception request and decision in the second half of 2024, well in advance of 2025 plan renewals. <p>ODDS will be providing more information about reductions and exceptions to support people and teams in 2024.</p>

Planning using the service group framework	
Question	Answer
When an ISP team chooses fewer hours than service group maximum, but later in the plan year it is determined that the person needs more, does this involve doing a change form to the higher amount available in the service group?	Yes, if the lower number is what is authorized on the ISP initially. This change form requires approval but does not require a signature.
Can hours be authorized in the ISP as the service group hour range? For example, authorizing 101-183 hours per month (using Adult 3 for this example)?	Yes, the ISP can include the service group hour range. In Plan of Care, however, a specific number must be authorized. ODDS does not recommend this practice. ODDS recommends that the ISP reflect the specific, maximum number of hours that the team determines will meet the person's needs within that service range. ODDS has prepared training that supports case managers in coming to that specific number. https://www.oregon.gov/odhs/compass/Documents/ihh-planning-range-slides.pdf
How will 2:1 and other higher staffing ratios be determined? What tool are we going to use for 2:1 hours?	If the ANA/CNA is higher, the ANA/CNA will be used to determine the staffing ratio hours. If the service group hours are higher, there is a form and worker guide to be used to authorize 2:1 staffing at the case management entity. https://www.oregon.gov/odhs/provider-s-partners/idd/workerguides/in-home-hours-exceptions.pdf

	<p>If the local process does not meet the person’s needs, an exception must be submitted to ODDS to request the needed staffing ratios.</p>
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Exceptions	
Question	Answer
<p>How long will an exception take?</p>	<p>New rules effective January 1, 2024, state that ODDS will decide within 45 days after submission of a completed exception request. The most time-consuming part of exception decisions is when the information provided in the request is not complete or does not clearly identify the need for the exception.</p> <p>ODDS recommends the following to increase the likelihood that a decision can be made quickly:</p> <ul style="list-style-type: none"> • Start planning early, two months prior to the ISP renewal date. • Attend trainings and review guidance about the exceptions criteria. • Ensure that the exception request is fully completed, and all necessary documents are submitted. • Thoroughly explain the need that is unmet that is prompting the exception, the frequency the need occurs, and the amount of time it will take to meet the need.

	<p>ODDS expects that with clear criteria in rule, more robust training, additional ODDS capacity, and better submissions will reduce the need for back-and-forth and reduce the amount of time needed to issue exception decisions.</p> <p>If an exception needs an urgent response, note that in the request.</p>
<p>About half of the people who receive in-home services will see a reduction to their in-home hours based on the ONA, how will CMEs and ODDS have capacity to process all these exceptions?</p>	<p>No one will receive a reduction to their in-home hours until after March of 2025. Not everyone that will see a reduction in their in-home hours after March of 2025 will need an exception.</p> <p>If they do need to submit an exception, ODDS will be ready to support CMEs with these exception requests. ODDS is planning to provide additional training and communications about exceptions in 2024. No exceptions need to be submitted for reductions in 2025 until late 2024.</p>
<p>Where can case managers find more the criteria that will be used for in-home exceptions?</p>	<p>The In-Home Hours Exceptions Worker Guide has detailed information about the exception criteria for both hours over the service group allocation and staffing ratios above 1:1.</p> <p>https://www.oregon.gov/odhs/provider-s-partners/idd/workerguides/in-home-hours-exceptions.pdf</p>
<p>Many children in CIIS have high levels of support needs that exceed the number of hours available in their service group.</p>	<p>ODDS expects that most children enrolled in CIIS have an exceptional level of need based on their enrollment in the CIIS program. For</p>

<p>Many have unfilled nursing hours because of the nursing shortage. Will the process be different for CIIS exceptions?</p>	<p>children in CIIS who have nursing assessments, they will continue to have the option of using the higher of either the ONA (instead of the CNA) or nursing assessment for attendant care hours if nurses are unavailable, according to current CIIS process. The exceptions process and criteria for children enrolled in CIIS will be the same as exceptions for other in-home service recipients.</p>
<p>Is behavior data required for exceptions?</p>	<p>Exceptions related to challenging behavior will need to have documentation of the behavior need, the type of supports needed, the frequency of the need, and the amount of time needed to meet the support needs. A behavior consultant should work with the case manager and the supporters to develop a system to collect this information in a way that works for the person and their team.</p>
<p>Is an exceptions request needed to get the maximum hours available in the service group framework (513 hours)? Is that the maximum that will be authorized for anyone?</p>	<p>513 hours is the maximum that can be authorized for a person in "Adult 5: Very High" service group without an exception. Exceptions requests should be specific to the number of hours anticipated to adequately meet a person's needs. There is not a maximum number of hours that can be approved.</p>
<p>For anyone with short-term changing/increasing support needs after January 2024, will CMEs continue asking for exceptions or is there a different practice?</p>	<p>Acute changes in support needs expected to last for a short period should continue to use the exceptions process.</p>

For people with ODDS approved 2:1 exceptions already in place, when will those expire?	Increased staffing ratios (2:1 and above) that were approved by ODDS are extended through the end of the maintenance of effort period.
How will the ONA determine enhanced or exceptional needs for the purpose of a higher PSW rate?	The ONA already determines this. You can find a Worker Guide here for further information: https://www.oregon.gov/odhs/provider-s-partners/idd/workerguides/in-home-hours-exceptions.pdf

Service Group Hours	
Question	Answer
Where can I find the service group hour ranges for plans starting January 1, 2024, and later?	https://www.oregon.gov/odhs/compass/Documents/service-group-hours-table-color-en.pdf
Even at the level the ONA is indicating, I am finding the hours are inadequate for the children I support. As developments continue, is there a way to have a service group for these exceptions?	The service group ranges for all ages have been established. If someone's needs are not or will not be met within their ONA hour range when their 2025 plan renews, ODDS will be ready to support CMEs with exceptions requests. For children in CIIS who have nursing assessments, they will continue to have the option of using the higher of either the ONA (instead of the Child Needs Assessment (CNA)) or nursing assessment for attendant care hours if nurses are unavailable, according to current CIIS process.

<p>Is the General Needs Score included in the SG level?</p>	<p>General support needs, medical support needs, and behavioral support needs all contribute to ONA SG.</p>
<p>I have a question around the range, its already a range from zero to the top number, so what is the purpose? I just can't wrap my head around it.</p>	<p>The Adult Needs Assessment/Child Needs Assessment (ANA/CNA) generate a single maximum number of hours, down to zero. You are right that a person could choose fewer hours, down to zero. The ONA Service Group (SG) ranges are intended to reflect that even people with similar support needs are different, and some may need the lower end of the range while others need the higher end. The ONA ranges are valid and reliable, meaning, most people with similar Activities of Daily Living, Instrumental Activities of Daily Living (ADL, IADL), medical, and/or behavior support needs can have their needs adequately supported with a number of hours somewhere within their SG range. The ONA ranges also encourage thinking about hourly supports more holistically, in the context of people's unique lives. It is still OK for a person to choose a number of hours even lower than the bottom of their SG range. If the authorized hours are below the bottom of the range, it could indicate that there are unmet needs, the person is choosing to allow needs to go unmet, or the needs are met by other means. When hours are below the bottom of the range should cause a case manager to know and understand why.</p>

<p>How are hours determined based on service groups compared to ANA?</p>	<p>The ONA and the ANA/CNA tools are not comparable tools; they determine service levels in different ways. The ONA service group ranges are valid and reliable to meet most people's needs. If the upper end of a SG range is too low to meet someone's unique needs, an exception should be requested.</p>
<p>When a person changes age categories in the middle of their ISP plan year and are they automatically eligible for the service groups associated with their biological age?</p>	<p>No. The service group is set by the age the person was when their ONA was completed. That service group continues until a new ONA is completed and the ISP is updated, even if the person has aged out of that age category. If the age-appropriate ONA occurs before the birthday that would move the person into a new age category, the person can access that service group as soon as those are included in the ISP.</p>
<p>If parents/clients do not agree with their assigned service group, do we reassess with the ONA?</p>	<p>The person or their designated representative can request a reassessment at any time, a provider cannot. If the new ONA doesn't resolve the concern, then the ISP team can request an exception. If an exception is not desired, and the concern persists, a complaint can be made to ODDS via an email to the Complaint Coordinator.</p>
<p>Is exclusive focus a separate factor in the ONA as it is in the CNA/ANA?</p>	<p>No. Hours are determined as a whole and assigned to a service group to provide the supports identified throughout the ONA.</p>

<p>Are nighttime supports a separate factor in the ONA as it is in the CNA/ANA?</p>	<p>No. Supports are assessed on a 24-hour basis in the ONA. During service planning, a discussion about nighttime needs can inform the number of hours that are needed and how those hours can be used to provide the supports that happen overnight. It is appropriate to describe the nighttime needs in the ISP and any applicable service agreements if a provider is expected to provide supports during the night. If the hours in a person's assigned service group are not able to meet their needs, the person can request an exception.</p>
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