

**To:** Superintendents, SSA Directors, COG Directors, Providers

**From:** Lori Horvath

**Date:** October 20, 2016

**Subject:** Adult Day Waiver Daily Rates

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The Centers for Medicare and Medicaid Services (CMS) recently informed Ohio that the proposed amendments to the Level One, Individual Options, and SELF Waivers submitted in August will not be effective on November 1, 2016. CMS will be submitting additional questions to the state, resulting in a delayed effective date. This includes a delay in the implementation of the proposed changes to adult day waiver services.

We know that all of you have been working hard to implement the proposed changes to the adult day waiver services which we fully expected to be in place November 1. We know the delay causes extra work to undo some of what you have already done, which we regret. We have tried to minimize the amount of this, but we cannot eliminate it entirely. County boards and providers have invested a great deal of time participating in training sessions to learn about the new and modified services, helping individuals/families understand what these changes mean to them, and making necessary modifications to service plans and waiver authorizations. This training and the planning that you are doing for individuals and families will still pay off at the time when we are able to implement these waiver services.

Having the amendment effective date delayed has prompted questions regarding how service authorizations and claims submissions should be handled during this period in which we are awaiting feedback from CMS. The Ohio Department of Developmental Disabilities (DODD) issued guidance which focused primarily on service authorizations on October 17<sup>th</sup>. The purpose of this communication is to share information with providers regarding the elimination of the “combo code” and the alternatives available for claims submission.

For dates of service beginning 11/1/16, the “combo code” will no longer be available for providers who deliver a combination of Adult Day Support and Vocational Habilitation to individuals enrolled in waivers. Providers will still be able to submit claims for the Adult Day Support daily rate or the Vocational Habilitation daily rate when delivering between 5 – 7 hours a day of one or both services. When a provider delivers between 5 – 7 hours of a combination of Adult Day Support and Vocational Habilitation, the provider may either submit a daily billing unit reflecting the services provided for the majority of the day, or the provider may submit 15-minute billing units for each discrete service.

Example 1:

A day provider delivers one hour of Vocational Habilitation and four hours of Adult Day Support to a person in a given day. Since the provider delivered Adult Day Support services for most of the day, the provider may submit a daily billing unit of Adult Day Support (ADS, FDS, SDS) for that day, or the provider may submit 4 15-minute units of Vocational Habilitation (AVF, FVF, SVF) and 16 15-minute units of Adult Day Support (ADF, FDF, SDF) for that day.

Example 2:

A day provider delivers 2 hours of Adult Day Support and 4 hours of Vocational Habilitation to a person in a given day. Since the provider delivered Vocational Habilitation services for most of the day, the provider may submit a daily billing unit of Vocational Habilitation (AVH, FVH, SVD) for that day, or the provider may submit 8 15-minute units of Adult Day Support (ADF, FDF, SDF) and 16 15-minute units of Vocational Habilitation (AVF, FVF, SVF) for that day.

Regardless of the billing unit chosen by the provider, it is important that each person's ISP clearly reflect the services the person is expected to receive (Adult Day Support, Vocational Habilitation, or both). Teams should also identify expected outcomes for service(s), as part of the annual planning process. Ongoing training and technical assistance regarding the intended outcomes of adult day and employment services, as well as the writing individual-specific outcomes in plans, will be provided by both DODD and the Ohio Association of County Boards (OACB).

Thank you for your patience and understanding with this unanticipated delay. We will continue to share information regarding the status of the amendments as we receive updates from CMS.

Please feel free to contact DODD's Support Center at 1-800-617-6733 with any claims-related questions.