BURNS & ASSOCIATES

A DIVISION OF

HEALTH MANAGEMENT ASSOCIATES

New Rate and Payment Options Overview

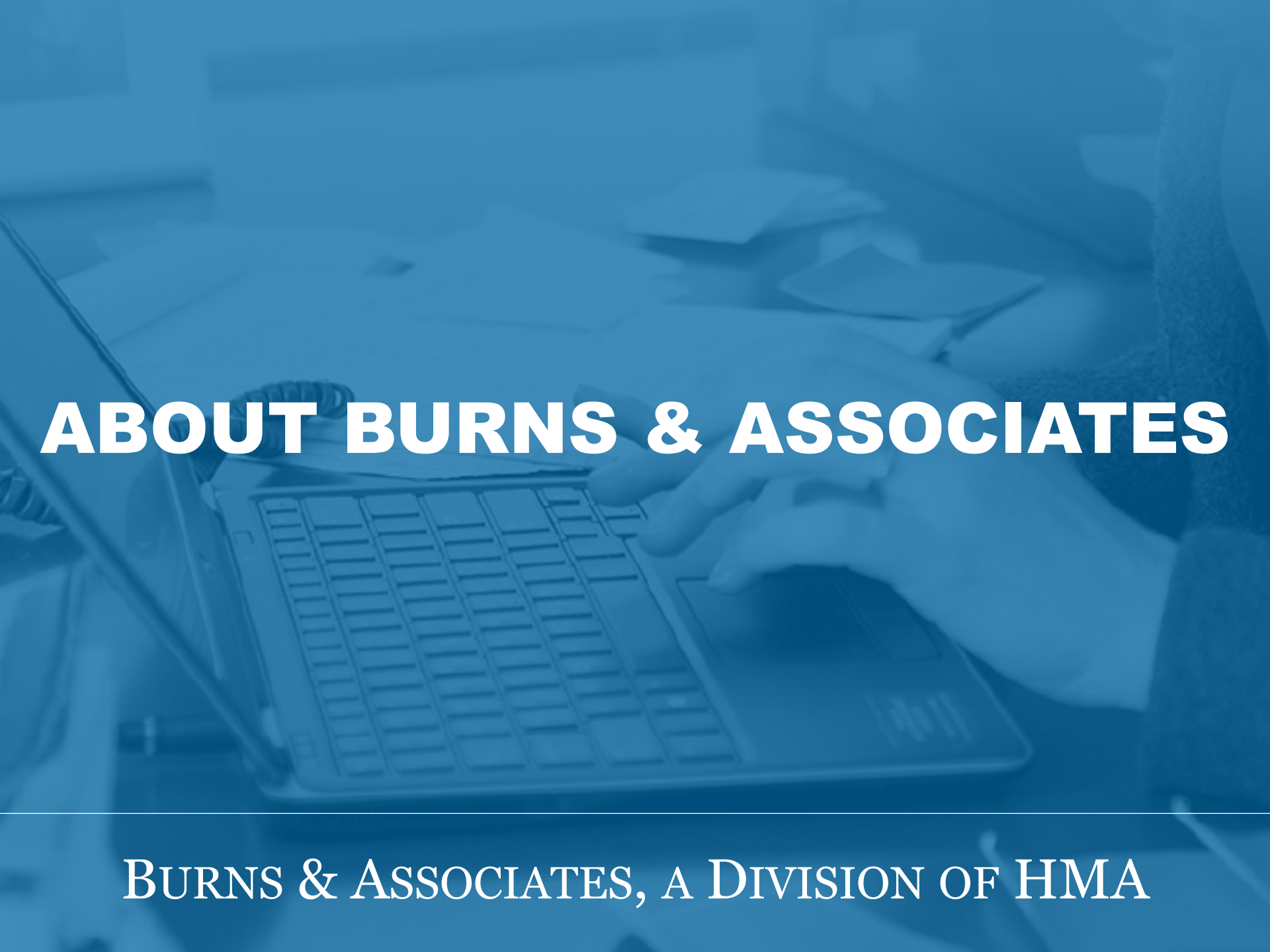
- prepared for -

Rhode Island Department of Behavioral Healthcare, Developmental Disabilities and Hospitals

February 2, 2022

Agenda

+ About Burns & Associates
+ Rate Study Approach
+ Rate Study Tasks
+ Individual Budgets Tasks
+ Discussion and Next Steps



ABOUT BURNS & ASSOCIATES

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Overview of Burns & Associates

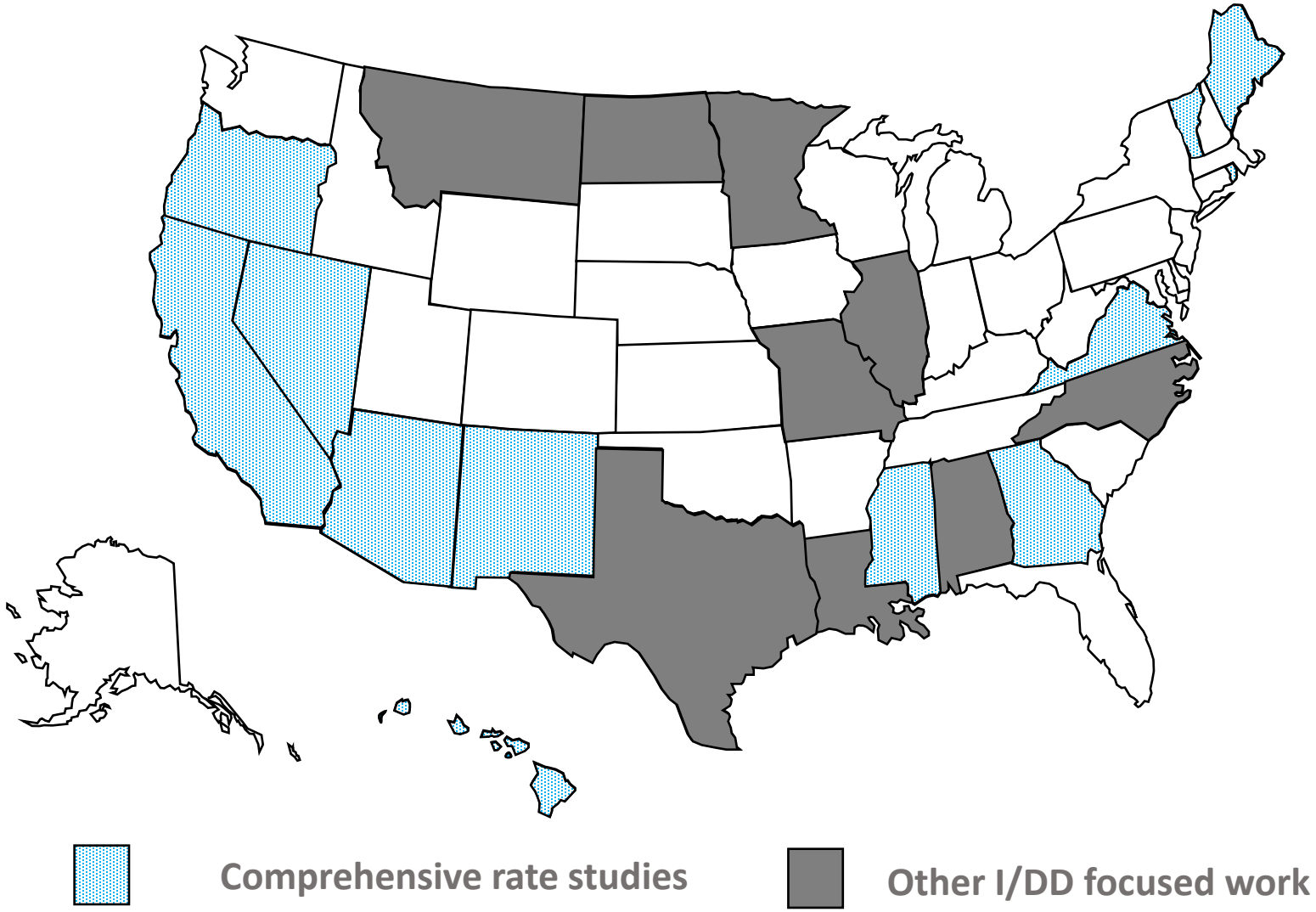
- Health policy consultants specializing in assisting state Medicaid agencies and related departments (developmental disabilities and behavioral health authorities)
  - Consulted in approximately 30 states since its founding in 2006
  - Acquired by Health Management Associates in September 2020
- Experience in the intellectual and developmental disabilities field
  - Policy development, including service standards and billing rules
  - Rate-setting
  - Using assessment instruments to inform individualized budgets
  - Program operations, including performing fiscal analyses and developing implementation approaches
- Primary consultant on BHDDH's Project Sustainability initiative

Overview of Human Services Research Institute

- National nonprofit, tax-exempt corporation founded in 1976

- Works to improve supports for people with disabilities and other underserved populations
- Experience in the intellectual and developmental disabilities field
  - Supporting system redesigns, including service design
  - Engaging self-advocates and families
  - Adopting person-centered practices
  - Using needs assessments to inform individualized budgets

Burns & Associates' I/DD Experience



Burns & Associates' I/DD Experience

+ Results and status of HMA-Burns' rate study projects

State	Implementation Status	Fiscal Impact and Funding Status
Rhode Island	Implementation began in 2011	Proposed rates not implemented (Legislature imposed reductions requiring rates to be scaled back)
New Mexico	Implementation began in 2013	($10 million), funds were retained in the system
Arizona	Rates adopted in 2015	$188 million (about $50 million added in the years after the study)
Virginia	Implementation began in 2016	$58 million, fully funded
Oregon	Implementation occurring in phases between 2016 and July 2022	$195 million, fully funded
Georgia	Implementation began in 2017*	$74 million, fully funded
Hawaii	Implementation began in 2017	$26.5 million, fully funded
Mississippi	Implementation began in 2017	$20 million, fully funded
California	Implementation occurring in phases between January 2020 and July 2025	$2.3 billion, fully funded
Maine	Implementation began in 2021*	$2.5 million, fully funded
Nevada	Implementation under consideration	$38.2 million, proposed to fund with ARPA dollars
Vermont	Rate study still in process	N/A
***Implementation status based on most recent HMA-Burns' rate study**		

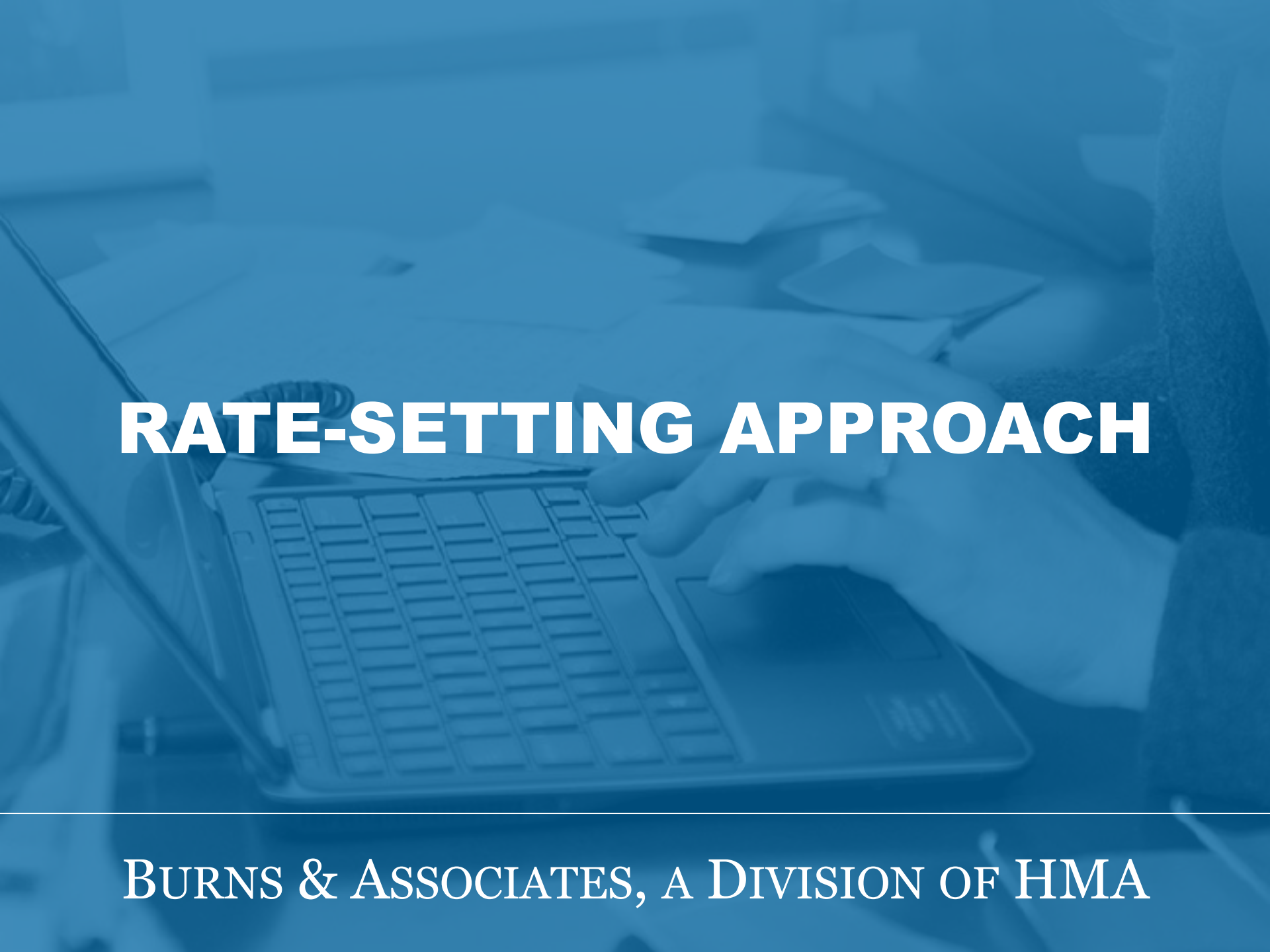
Summary of Previous Rhode Island Rate Study

- Goals of previous rate study
  - Transition from bundled payments to fee-for-service rates
  - Align payment with individuals' assessed needs
- Proposed rates published in May 2011
  - Before the rates could be implemented, the Legislature cut the program's budget by $16 million
  - BHDDH directed Burns to reduce the rates by about 18 percent to conform to the reduced budget
  - Until the July 2021 rate increases, many payments remained below what Burns proposed in 2011

Project Leadership

- Stephen Pawlowski, HMA-Burns Managing Director
  - Joined B&A in 2009 and has led B&A's HCBS practice since 2015
  - Previously served as Chief Financial Officer of the Arizona Department of Economic Security, which administers the state's I/DD system

- John Agosta, HSRI Senior Policy Fellow
  - Joined HSRI in 1983, total of 40 years of experience working with people with disabilities
  - Been involved with nearly all of HSRI's projects involving assessment-informed budgets



RATE-SETTING APPROACH

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Purpose of Independent Rate Model Approach

- Rate models should reflect the costs providers incur to deliver services consistent with the state's requirements and individuals' service plans

- Consider data from multiple sources rather than depending on any single source
  - Policies, rules, and standards
  - Provider and stakeholder input (e.g., provider survey, public comments)
  - Published sources (e.g., BLS wage data, IRS mileage rates)
  - Special studies (e.g., analysis of regional differences in transportation-related costs)

Development of Independent Rate Models

- Specific model assumptions are detailed (e.g., staff wages and benefits, staffing levels, transportation, etc.)
  - Assumptions are not mandates (i.e., a provider does not have to pay the wage assumed in the rate)

- A single service may have multiple rates to account for various differences
  - Individuals' levels of need (affecting staffing levels, staff qualifications, etc.)
  - Service setting (e.g., facility or community-based)
  - Staff qualifications and training (e.g., RNs and LPNs)
  - Geography (e.g., urban and rural)

Development of Independent Rate Models

- Five factors in all HCBS rate models
  - Direct care worker wages
  - Direct care worker benefits
  - Direct care worker productivity (time spent on billable vs. non-billable activities)
  - Program support
  - Administration

- Other factors vary by service
  - Staffing ratios
  - Attendance/ occupancy
  - Transportation-related costs
  - Program facilities and supplies

		Personal Care
	Unit of Service	Hour
Direct Care Staff Wages and Benefits	- Percent of Direct Care Staff Working Full-Time	70%
	- Direct Care Staff Hourly Wage	$15.89
	- Employee Benefit Rate (as a percent of wages)	22.37%
	- Workers' Compensation Rate (as a percent of wages)	4.83%
	Hourly Staff Cost Before Productivity Adj. (wages + benefits)	$20.21
	Productivity Adjustments	
	Total Hours	34.60
	- Travel Time Between Individuals	0.58
	- Recordkeeping and Reporting	0.58
	- Supervision and Other Employer Time	0.90
	- Training	0.67
	- Paid Time Off	3.04
	"Billable" Hours	28.83
	Productivity Factor	1.20
	Staff Cost After Productivity Adj. per Billable Hour	**$24.25**
Mileage	- Number of Miles Traveled per 40-Hour Week	60
	- Number of Miles Adjusted for Mix of FT and PT Staff	52
	- Amount per Mile	$0.575
	Weekly Mileage Cost	$29.90
	Mileage Cost per Billable Hour	**$1.04**
Supervision	- Supervisor Hourly Wage	$23.03
	- Supervisor Benefit Rate (as a percent of wages)	19.77%
	- Workers' Compensation Rate (as a percent of wages)	4.83%
	Hourly Supervisor Cost (wages + benefits)	$28.70
	Weekly Supervision Cost	$1,148.00
	- Number of Direct Care Staff Supervised	15
	Supervision Cost per Billable Hour	**$2.65**
Admin. and Prog. Operations	Cost per Hour, Before Program Operations and Administration	$27.94
	- Daily Program Operations Costs	$10.00
	Program Operations Cost per Billable Hour	**$1.73**
	- Administration Percent	12.0%
	Administration Cost per Billable Hour	**$4.05**
	Rate per Billable Hour	**$33.72**

Rate Model Example – Personal Care

- Direct care staff wages and benefits
  - Largest component of costs (60-80 percent) when including productivity
  - Data gathered from multiple sources
    - Review of staff qualifications and responsibilities
    - Provider survey
    - Bureau of Labor Statistics data
- Accounting for 'productivity'
  - Rate models seek to reflect a 'typical' week for direct care staff by establishing productivity adjustments for non-billable time
  - Examples include training, travel, documentation, and employer time

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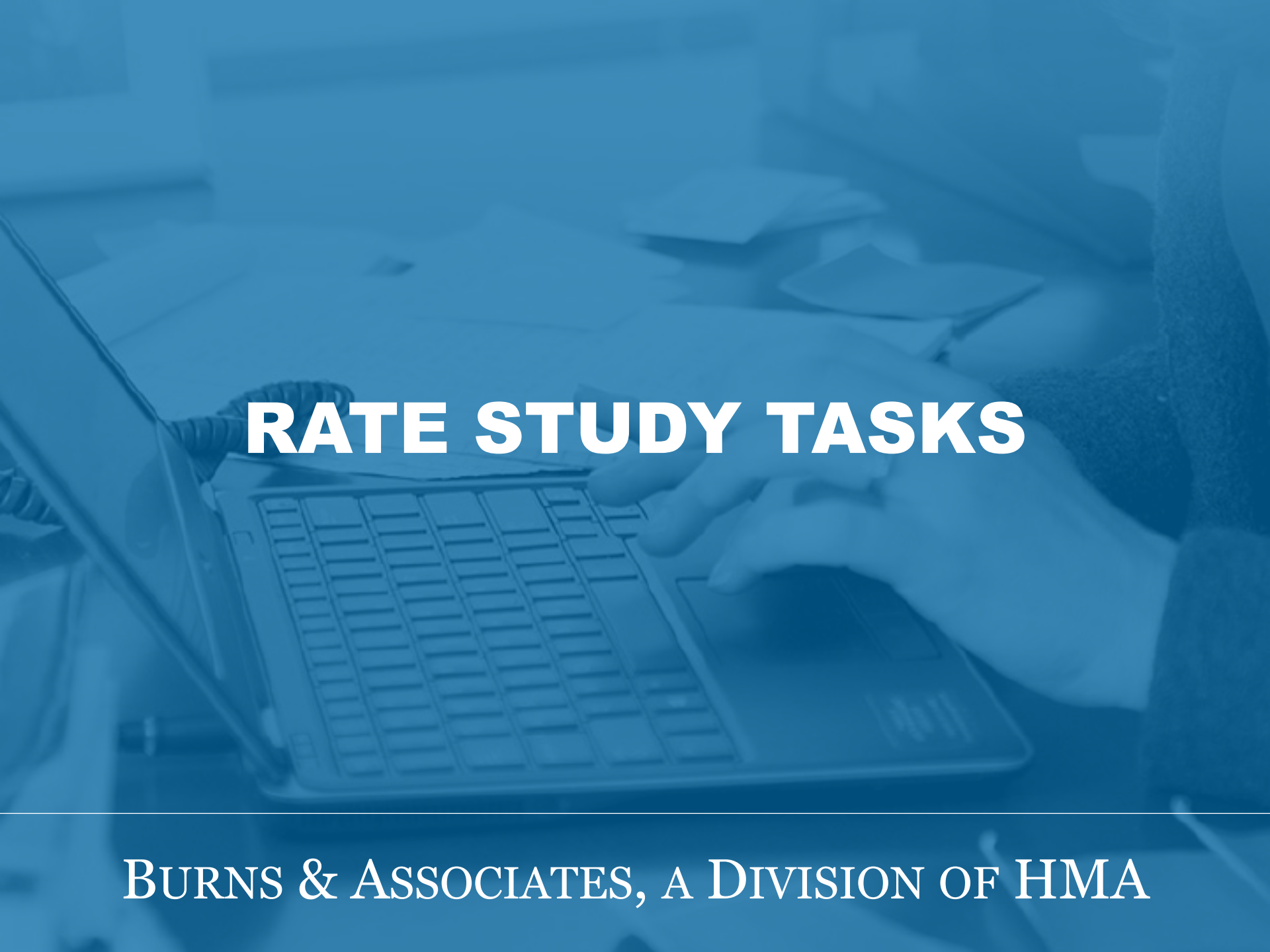
Rate Model Example – Personal Care

- Program support costs
  - Activities that are program specific, but not billable
  - Examples: supervision, training, and program development
- Administrative costs
  - Organizational costs that are not program-specific
  - Examples: executive management, accounting, and human resources
- Other costs vary by service
  - Examples: mileage, staffing ratios, program attendance rates, and program facility and supplies costs

Benefits of Independent Rate Model Approach

- Transparency
  - Models detail the factors, values, and calculations that produce the final rate
- Ability to advance policy goals/objectives
  - For example, improving direct care staff salaries or benefits, reducing staff-to-client ratios, incentivizing community-based services, etc.
- Efficiency in maintaining rates
  - Models can be scaled and adjusted for inflation or specific cost factors (e.g., IRS mileage rate) or to meet budget targets



RATE STUDY TASKS

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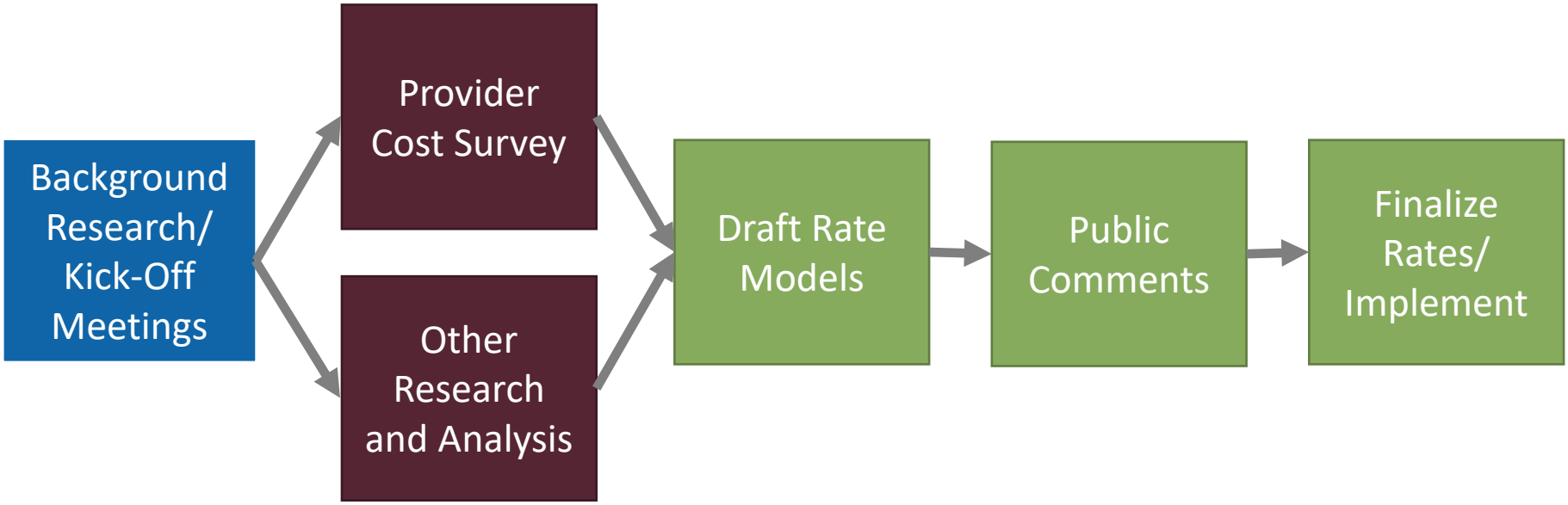
Rate Study Process



Background Research and Kick-Off Meetings

- "When you've seen one I/DD system…you've seen one I/DD system"
  - For example, day habilitation requirements can vary significantly in terms of staffing ratios, transportation, meals, and community participation

- Key subtasks
  - Review and document service requirements to identify primary cost drivers, appropriate rate structure for each service, and possible value-based approaches
  - Review changes to federal or state policies to evaluate potential impacts on rates (e.g., Rhode Island's consent decree, CMS' final rule on community integration, electronic visit verification, $15 minimum wage) as well as the effects of the Covid-19 pandemic
  - Evaluate existing 1115 waiver and suggest any needed changes
  - Kick-off meetings with BHDDH and providers

Provider Survey

- Design survey to collect information regarding costs and service delivery issues (e.g., direct care staff productivity, staffing ratios, and mileage)
  - Results inform, but do not dictate, rate model assumptions
- Provide technical assistance
  - Written instructions, recorded webinar to walk-through the survey, dedicated contact for questions
- Analyze survey results
  - Perform desk reviews of submitted surveys, perform statistical analysis, present results

Other Research and Analysis

- Collect independent data for individual cost drivers (e.g., BLS wage data)
- Compile current rate and payment data to develop a fiscal impact model that will be used to estimate impacts of potential changes to services and rates
- Identify and analyze potential rate variants (e.g., based on geographic region, staff qualifications, etc.)
- Identify appropriate procedure codes and billing rules
- Identify benchmark payment rates for comparable services paid by other programs in Rhode Island and in other states

Draft Rate Models

- Develop draft model structures identifying cost factors for each service
  - As appropriate, consider various options (e.g., changes to billing units, bundling or unbundling activities, etc.)
  - A service may have multiple 'variants' due to differences in staff qualifications, geography, members' needs/ staffing intensity, etc.
- Populate rate models with cost assumptions
  - Consider provider survey and other independent data sources
  - Develop rate model appendices and other supporting documentation
- Estimate fiscal impact
  - Estimate using historical claims as baseline expenditures, including consideration of Covid-related impacts

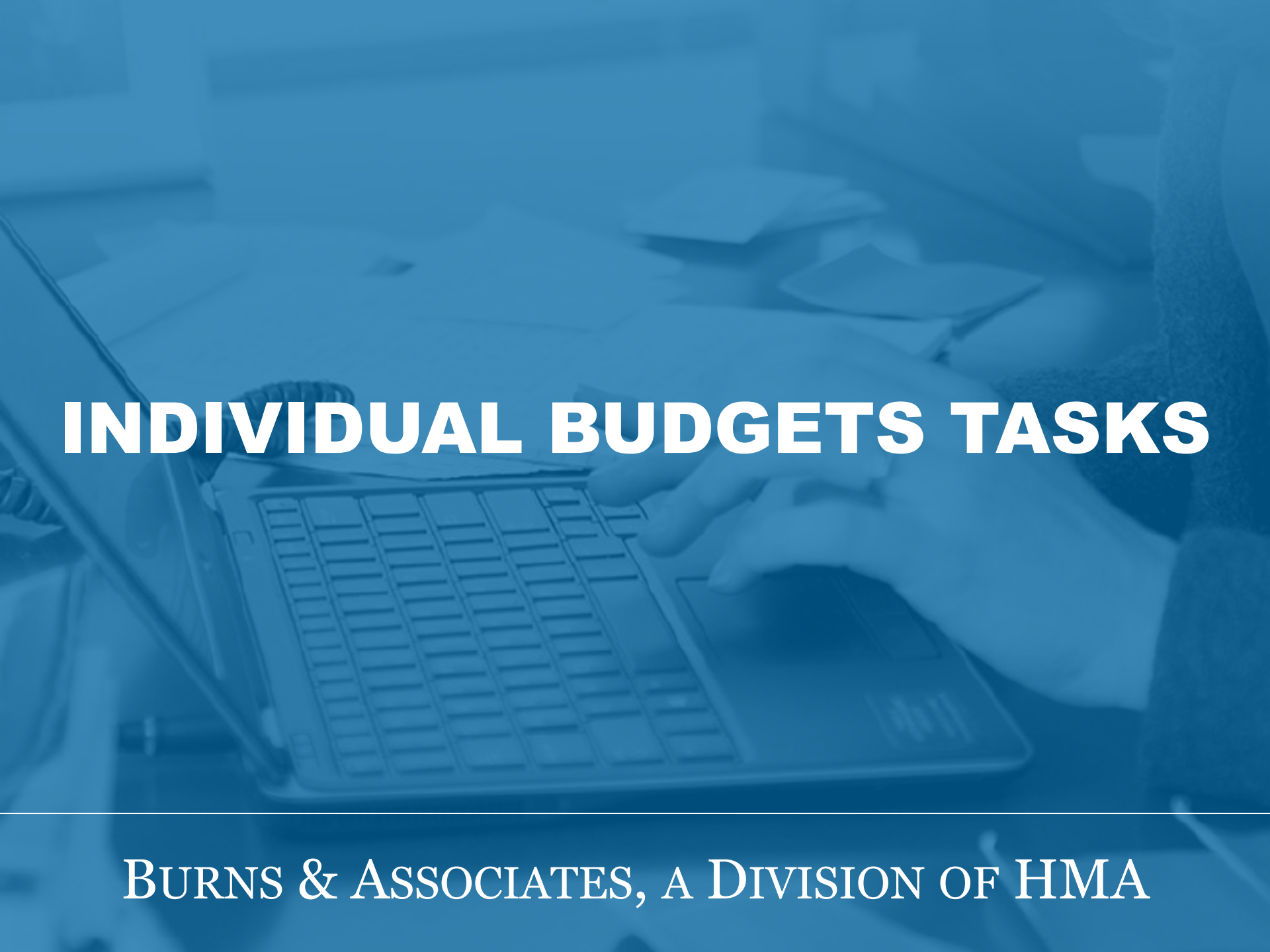
Public Comments

- Post rate models and supporting materials online
  - Includes recorded webinar to explain the proposals
- Accept written comments
  - Typically allow about four weeks for comments
- Review and summarize comments

Finalize Rate Models and Implement

- Revise rate models based on public comments as warranted

- Provide implementation support as necessary
  - Estimate fiscal impact and provide support in state budget process
  - Create briefing materials for providers, legislators, and other stakeholders
  - Develop phase-in plan as needed
  - Provide support with 1115 waiver amendments



INDIVIDUAL BUDGETS TASKS

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Using Assessment Results to Inform Rates and Individual Budgets

- Consideration of current assessment framework
  - Number of levels (e.g., the project team has recently developed a five-level framework)
  - Criteria for each level (e.g., the project team's recent frameworks have narrowed the criteria for level 1)
  - Supplemental questions and verification process

- Consideration of other factors
  - Exceptional medical or behavioral needs
  - Issues associated with primary caregivers

Evaluating Current Service Packages

- Review background materials to document current budgets and how they are administered
- Consider types and amounts of support built into the service package for each cohort
- Identify the need for potential changes
  - Facilitate discussions with BHDDH and stakeholders
  - Analyze historic authorization and service usage by cohort to identify areas where usage is substantially above or below the service package assumptions
  - Review requests for exceptions

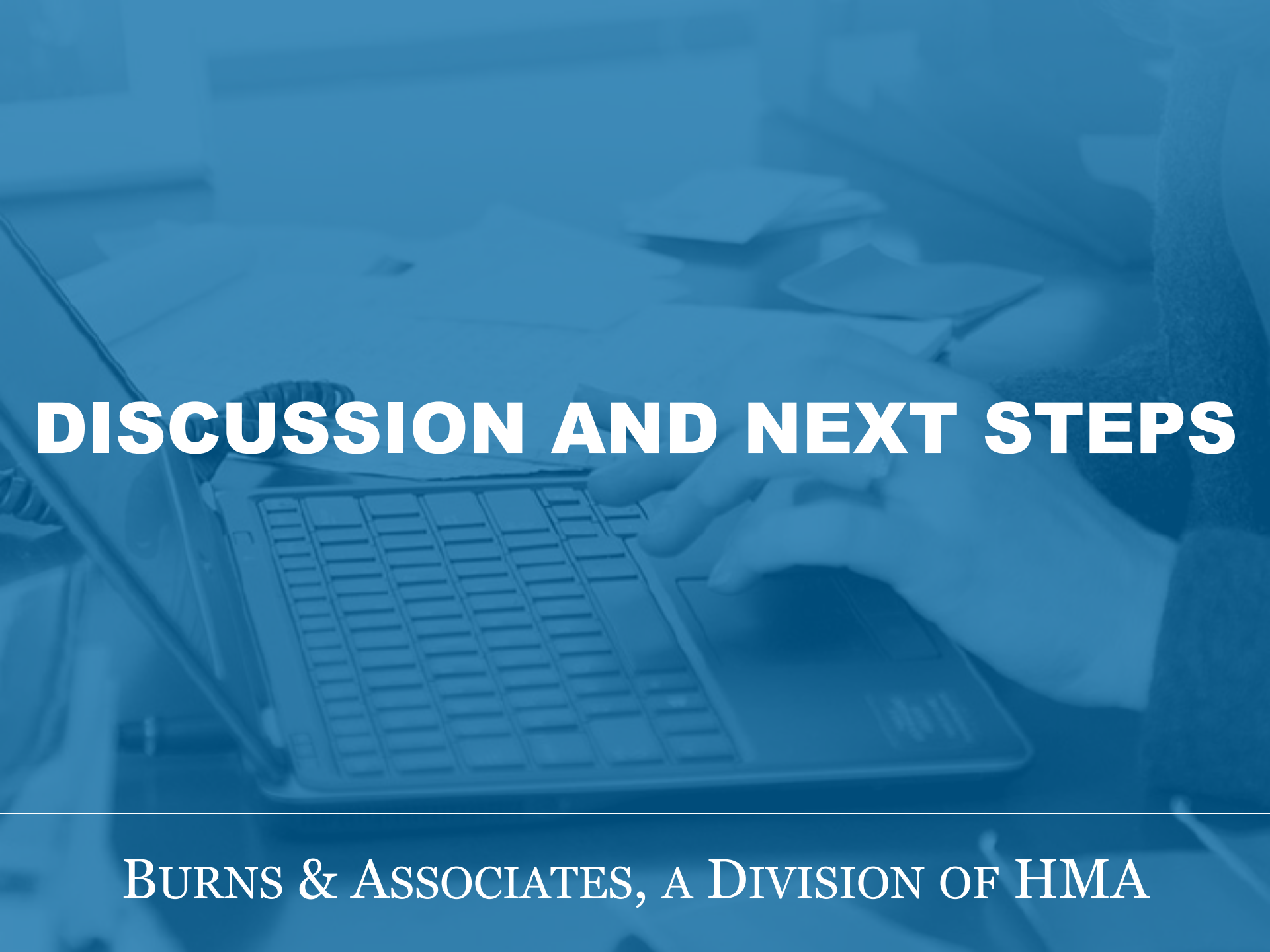
Analyzing Management of Individual Budgets

- General topics
  - Services included/ excluded from individual budgets
  - Ability to move funds between services or service groupings
  - Exceptions process

- Relationship to self-direction
  - Extent to which individual budgets offer comparable access to services compared to those using traditional agency services
  - Comparison of utilization across those who do and do not self-direct

Benchmarking Rhode Island's Methodology to Other States

- Conduct comprehensive review of Medicaid-financed HCBS programs across the country
  - Assessment instrument used and other factors considered
  - Level-based systems versus an algorithm that produces a specific budget for every possible combination of assessment results
  - Services included/ excluded from individual budgets
  - How self-direction is incorporated in the framework
  - Ability to move funds between services or service groupings
  - Exceptions process



DISCUSSION AND NEXT STEPS

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Discussion

- BHDDH project goals and impressions of current rates and budgets

- Stakeholder engagement
  - Providers
  - Court monitor/ Department of Justice
  - Individuals and families

Next Steps

+ Draft project work plan

+ Document and data request

+ Schedule meeting(s) to walk-through service requirements

+ Schedule kick-off meeting with providers

Stephen Pawlowski

spawlowski@healthmanagement.com

(602) 466-9840

3030 North 3rd Street, Suite 200

Phoenix, Arizona 85012

www.healthmanagement.com/who-we-are/burns-associates/